

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

CASE NO. 17-CV-823

CONSUELA SMITH-WILLIAMS, FRED
RIVERS, RICHARD MURPHY, ROBERT
RISTOW, ROGER SUHR, and
SALVADOR FUENTES, individually,
and on behalf of all similarly situated,

Plaintiffs,

vs.

THE UNITED STATES OF AMERICA,

Defendant.

DEPOSITION OF VICTORIA BRAHM

witness in the above-entitled action, taken
under the Federal Rules of Civil Procedure,
before Mary P. Hader, Registered Professional
Reporter and Notary Public in and for the State
of Wisconsin, at the Tomah VA Medical Center, 500 East
Veterans Street, Building 408, Conference Room 3815A,
Tomah, Wisconsin, on September 25, 2018, commencing at
2:40 p.m. and terminating at 4:00 p.m.

REPORTED BY:
Mary P. Hader, RPR, CSR



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

2

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

APPEARANCES OF COUNSEL
ON BEHALF OF THE PLAINTIFFS:
THE DOWNS LAW GROUP - MIAMI-DADE OFFICE
ATTORNEY WILLIAM T. RIEDER, JR.
3250 Mary Street, Suite 307
Coconut Grove, FL 33133
ON BEHALF OF THE DEFENDANTS:
U.S. DEPARTMENT OF JUSTICE
UNITED STATES ATTORNEY'S OFFICE
ATTORNEY DAVID D. CONWAY
ASSISTANT UNITED STATES ATTORNEY
WESTERN DISTRICT OF WISCONSIN
222 West Washington Avenue, Suite 700
Madison, WI 53703

4

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

INDEX OF EXHIBITS
EXHIBITS DESCRIPTION PAGE
G Article, Victoria Brahm tries to heal scandal-plagued Tomah VA Medical Center 13
H Report of Contact, Victoria Brahm 18
I Service Chief Approval 26
J Report of William J. O'Brien, DDS 32
K Letter of November 29, 2016 51
L CERT report 52
(Original exhibits attached to original transcript.
Copies of exhibits attached to transcript copies.)

3

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

INDEX OF EXAMINATION
WITNESS NAME: Victoria Brahm PAGE
DIRECT EXAMINATION
BY Mr. Rieder 5
CROSS EXAMINATION
BY Mr. Conway 67 - 69
REDIRECT EXAMINATION
BY Mr. Rieder 69 - 72

5

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

DEPOSITION OF VICTORIA BRAHM
SEPTEMBER 25, 2018
THEREUPON:
VICTORIA BRAHM,
having been called as a witness herein, being first duly
sworn, was examined and testified as follows:
DIRECT EXAMINATION
BY MR. RIEDER:
Q Could you please state your name for the record.
A Victoria Brahm.
Q And your address?
A [REDACTED]
[REDACTED]
Q And your date of birth, please.
A [REDACTED]
Q And are you represented by counsel here today?
A Yes, I am.
Q Are you currently employed?
A Yes, I am.
Q Where are you employed?
A The Tomah VA Medical Center.
Q And what is your position?
A The medical center director.
Q Have you ever had your deposition taken



Brahm, Victoria 09-25-2018

<p>6</p> <p>1 before?</p> <p>2 A Yes, I have.</p> <p>3 Q How many times?</p> <p>4 A Oh, I -- many. I -- I can give you a</p> <p>5 ballpark.</p> <p>6 I don't -- maybe ten.</p> <p>7 Q I'll take the ballpark.</p> <p>8 Okay. Ten?</p> <p>9 A Yeah.</p> <p>10 Q Were any of those cases in which there was an</p> <p>11 allegation of negligence against the Tomah VA?</p> <p>12 A Let's see. I have to try and think of them.</p> <p>13 There were allegations. There were</p> <p>14 allegations in one.</p> <p>15 Q Okay. What were the allegations?</p> <p>16 A I think that was with the veterans assistance</p> <p>17 foundation when we were moving them off the property, so</p> <p>18 there were allegations, you know, that we might be doing</p> <p>19 harm by moving them off the property.</p> <p>20 Q Was that in relation or in response to an</p> <p>21 incident where a veteran died?</p> <p>22 A That wasn't directly in response to that.</p> <p>23 There were multiple issues with that foundation causing</p> <p>24 me to want to stop the contract and move them off the</p> <p>25 property. That was one of the issues.</p>	<p>8</p> <p>1 is that involving the over the prescription or</p> <p>2 overprescription of opioids or pain medication?</p> <p>3 A Yes. There were multiple investigations</p> <p>4 surrounding that whole series of events.</p> <p>5 Q And how about involving -- the litigation</p> <p>6 involving Jay Simcakoski? Were you involved in that?</p> <p>7 A Some of the questions in the deposition</p> <p>8 brought up the incident, but his actual passing away was</p> <p>9 prior to me being here, so I guess -- I guess it would</p> <p>10 be yes, that some of those questions came up regarding</p> <p>11 care delivered, but, at the time, you know, I was not</p> <p>12 there, so I was not the person. I was talking about</p> <p>13 things that we'd done after that to remedy things.</p> <p>14 Q Okay. All right. Well, for this deposition,</p> <p>15 I just ask you to please wait until I finish my question</p> <p>16 before you begin your answer so we don't talk over each</p> <p>17 other so the court reporter can take down everything</p> <p>18 that you say. Please answer my questions out loud as</p> <p>19 opposed to shaking your head or nodding so the court</p> <p>20 reporter can record it. I ask you not to speculate and</p> <p>21 only answer a question if you know the answer. And if</p> <p>22 at any time you need a break, that's certainly fine;</p> <p>23 just let me know;</p> <p>24 I'll be happy to take a break, but just if there's a</p> <p>25 question pending, if you let me -- if you'll answer the</p>
<p>7</p> <p>1 Q And the other depositions that you were</p> <p>2 involved in, were those negligence actions as well?</p> <p>3 A Not to my knowledge; not negligence, no.</p> <p>4 Q Okay. Well, to your understanding, I mean,</p> <p>5 were they involving -- strike that.</p> <p>6 Were they involving tort claims?</p> <p>7 A No.</p> <p>8 Q I lost you. Can you hear me?</p> <p>9 A Yeah, I can hear you.</p> <p>10 No, this is the first one with tort claims.</p> <p>11 Q Okay. Well, let me ask you quickly. We don't</p> <p>12 have to spend a ton of time on this, but what were the</p> <p>13 other depositions relative to?</p> <p>14 A See, I'm trying to remember. I've done a lot</p> <p>15 of -- I know I've done a lot of testimony on issues, but</p> <p>16 some of them were the same ones over and over. There --</p> <p>17 I had to do one -- yes, there was another one. How</p> <p>18 could I forget.</p> <p>19 Dr. Houlihan with the whole opioid scandal.</p> <p>20 That was the other -- several depositions</p> <p>21 related to that. And so I suppose that was, that was</p> <p>22 more allegations against the Tomah</p> <p>23 Hospital. I was not the director at the time.</p> <p>24 Well, I was acting director.</p> <p>25 Q By the Dr. Houlihan scandal you're mentioning,</p>	<p>9</p> <p>1 question before you take the break. Does that sound</p> <p>2 good?</p> <p>3 A Sounds good.</p> <p>4 Q All right. Are you aware that a lawsuit has</p> <p>5 been filed by six veterans against the Tomah VA</p> <p>6 Medical Center?</p> <p>7 A Yes.</p> <p>8 Q Do you know what they allege happened?</p> <p>9 A Not in detail. I know stress is a factor.</p> <p>10 Q Okay.</p> <p>11 A Well, you mean, that they were exposed -- they</p> <p>12 feel they were exposed to potential viruses because of a</p> <p>13 negligent dentist.</p> <p>14 Q Okay. Is that true?</p> <p>15 A There was a negligent dentist. There was very</p> <p>16 low risk of some exposure to some veterans.</p> <p>17 Q So you say there was a negligent dentist.</p> <p>18 Do you think the VA, Tomah VA was negligent in</p> <p>19 any way?</p> <p>20 A No, I don't.</p> <p>21 Q Do you think it was all on the dentist?</p> <p>22 A I think it was a purposeful act of a dentist</p> <p>23 who knew better.</p> <p>24 Q You say it was purposeful. You mean it was</p> <p>25 purposeful in that he was purposefully breaching</p>



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

<p>10</p> <p>1 infection control standard or purposely trying to hurt 2 the veterans? 3 A I don't think it was malicious. I think it 4 was the latter, that he purposefully knew better and 5 vio- -- breached our policies which he was trained on. 6 Q So you don't think he was doing this to hurt 7 anybody? 8 A I don't think so. 9 Q Did anything in the investigation uncover that 10 he was attempting to hurt anybody? 11 A No, not to my knowledge. 12 Q All right. To complicate this, doing this 13 deposition by video conference, there appears to be 14 construction in the room next door, so you're probably 15 going to hear the jackhammer while we do this. 16 A I'm sorry. I did not do that on purpose. 17 Q I don't know. 18 Have you reviewed any documents before coming 19 here today? 20 A I did. 21 Q What did you review? 22 A I did refresh my memory. I read the IG 23 report. 24 I read some of my notes and time lines related 25 to what happened on certain dates to refresh my memory.</p>	<p>12</p> <p>1 A He is stationed in Milwaukee but is a VISN 2 employee. I was similar to that. I lived in 3 Milwaukee, a suburb of Milwaukee, and was a VISN 4 employee as well. 5 Q And I interrupted you. You were going to tell 6 me more about your background so I'll listen. 7 A Well, I was at the VISN for ten years as the 8 chief quality management officer and the chief nursing 9 officer. And then, prior to that, 25 years with the 10 Milwaukee VA in various positions. I started there in 11 1981 as a staff nurse. 12 Q And did you have any prior experience as a 13 director of a facility? 14 A Not a director. I graduated in 2004 from a 15 healthcare leadership institute with the VA. I was 16 there from 2004 to 2006. So actually graduation was in 17 2006. I also had core business training and have been a 18 quadrad leader, which means one of the four leaders in 19 the region. So not exactly a director, but in the 20 quadrad for those ten years. In addition, I have done 21 an acting director role in Iron 22 Mountain, Michigan. 23 Q And when did you first come to the Tomah VA? 24 A October 2015. 25 Q And that's incidentally the same month that</p>
<p>11</p> <p>1 I reread the investigation that 2 Dr. O'Brien did as well. 3 Q All right. And those notes and time lines 4 that you kept, is that personal notes that you have or 5 is that something that was turned over to the 6 investigators? 7 A Yeah. Everything should be -- should have 8 been turned over. Yeah, these aren't personal notes. 9 They are things that we submitted at the time 10 it was being looked into. 11 Q So what is your highest level of education? 12 A A Master's degree. 13 Q From where? 14 A UWM-Milwaukee. 15 Q All right. Did you have any jobs coming -- 16 before coming to Tomah VA? 17 A Yes. I have -- I've been with the VA over 37 18 years. But prior to this VA, I was at the 19 VISN 12 office, the regional office in Chicago. 20 Prior to that -- I'm sorry. 21 Q Where Dr. O'Brien is, by the way? 22 A I'm sorry. 23 Q Yeah, I know this is going to be problematic 24 but there's no way -- I said, is that where 25 Dr. O'Brien is, by the way?</p>	<p>13</p> <p>1 Dr. Schiller came to the Tomah VA. Is that right? 2 A That is right. 3 Q Did you have any role in his hiring? 4 A No. Other than signing off, you know, that is 5 done at the chief of staff. But when they set salary, 6 that comes through the director's office, so I would 7 have signed a document authorizing his salary. 8 Q Okay. What was the Tomah VA Medical Center 9 like when you took over? 10 A It was -- traumatized would be a good word. 11 They were actively going through this opioid 12 scandal. There were field hearings. There were 13 IG inspections, DEA inspections, multiple different 14 bodies. There were vacancies. We had to rebuild the 15 medical center. So I would call it traumatized. 16 MR. RIEDER: All right. If you'll take a look 17 at -- we're going to mark it as Exhibit G. 18 It's -- Mary, it's an article entitled 19 Victoria Brahm tries to heal scandal-plagued 20 Tomah VA Medical Center. 21 (Discussion off the record.) 22 (Brahm Exhibit G marked for identification.) 23 BY MR. RIEDER: 24 Q If you just take a look at it, Mrs. Brahm, and 25 just take a moment to orient yourself with it.</p>



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

<p style="text-align: right;">14</p> <p>1 Let me know when you're familiar with.</p> <p>2 A I am familiar with the article.</p> <p>3 Q All right. So I'm just -- I'm looking through</p> <p>4 it right here, and it says -- and I'm paraphrasing --</p> <p>5 that you were brought in to fix the place in the wake of</p> <p>6 the scandal. During an hour long interview in her</p> <p>7 office, Brahm pointed to improvements in care and a push</p> <p>8 to change the work culture. Says that Brahm described</p> <p>9 the necessity of confronting a toxic work culture.</p> <p>10 Is that accurate? Is that your statement?</p> <p>11 A There were -- yes, there were pockets of</p> <p>12 toxicity as well.</p> <p>13 Q Okay. In what way?</p> <p>14 A There were some areas where there was some</p> <p>15 bullying and intimidation by the previous leadership.</p> <p>16 That's one of the reasons that, you know, they're not</p> <p>17 here anymore. So there was not necessarily an</p> <p>18 environment there of psychological safety in those</p> <p>19 years.</p> <p>20 Q And the article says in a January 2015 report,</p> <p>21 the center for investigative reporting revealed a</p> <p>22 pervasive culture of intimidation and retaliation</p> <p>23 against employees.</p> <p>24 Can you hear me or am I talking too fast?</p> <p>25 THE REPORTER: It's too fast with this</p>	<p style="text-align: right;">16</p> <p>1 culture of intimidation, retaliation, and those that</p> <p>2 thought that the hospital couldn't survive, and you</p> <p>3 working to change that culture. But in -- tell me if</p> <p>4 you agree with me that that's not the kind of change</p> <p>5 that happens overnight.</p> <p>6 A It doesn't, but it was very rapid.</p> <p>7 Q So -- (vibration of voice) --</p> <p>8 MR. CONWAY: Bill, we're having that same</p> <p>9 problem again. I don't know if you want to try a</p> <p>10 disconnect-reconnect. Basically, your voice comes</p> <p>11 across in like a jackhammer sound.</p> <p>12 It's kind of a real rapid cutting in and out,</p> <p>13 so it doesn't --</p> <p>14 MR. RIEDER: All right. (Vibration of voice.)</p> <p>15 MR. CONWAY: Okay. All right.</p> <p>16 THE WITNESS: Should I try and see if</p> <p>17 I can get this jackhammering to stop?</p> <p>18 THE REPORTER: Sometimes it's the phone. Are</p> <p>19 your phones on? Because if that's that close,</p> <p>20 sometimes that will make a change.</p> <p>21 Can you put them --</p> <p>22 THE WITNESS: Sure.</p> <p>23 THE REPORTER: I hadn't thought about that the</p> <p>24 last time, but usually --</p> <p>25 MR. CONWAY: Do you think the hotspot's doing</p>
<p style="text-align: right;">15</p> <p>1 drilling in the background.</p> <p>2 MR. RIEDER: All right.</p> <p>3 THE REPORTER: The article says in a</p> <p>4 January '15 report, the center for --</p> <p>5 BY MR. RIEDER:</p> <p>6 Q -- investigative reporting, it revealed --</p> <p>7 revealed a pervasive culture of intimidation and</p> <p>8 retaliation against employees who spoke out.</p> <p>9 Is that what you're referencing?</p> <p>10 A Right. Much of that coming from the previous</p> <p>11 chief of staff.</p> <p>12 Q And who was that?</p> <p>13 A Dr. David Houlihan.</p> <p>14 Q Yeah. I think you went on to say there were</p> <p>15 those who thought the hospital couldn't even survive.</p> <p>16 Is that accurate?</p> <p>17 A Staff were scared. Staff were scared and</p> <p>18 there was some question about whether Tomah would be</p> <p>19 able to pull through this scandal because it was so</p> <p>20 public and traumatizing.</p> <p>21 Q So you had to work to change the culture?</p> <p>22 A Yes.</p> <p>23 (Discussion off the record.)</p> <p>24 BY MR. RIEDER:</p> <p>25 Q All right. So we talked about the pervasive</p>	<p style="text-align: right;">17</p> <p>1 it? Or is it necessary for what you're --</p> <p>2 THE REPORTER: I don't know. I don't think</p> <p>3 it's doing harm.</p> <p>4 MR. CONWAY: Okay.</p> <p>5 THE REPORTER: It has to be there for the</p> <p>6 connection to keep going.</p> <p>7 MR. CONWAY: Okay. Do you want it closer or</p> <p>8 farther away?</p> <p>9 THE REPORTER: It's not mine so I don't know</p> <p>10 how far away it works.</p> <p>11 MR. CONWAY: Okay. Sounds good.</p> <p>12 MR. RIEDER: Are you there?</p> <p>13 MR. CONWAY: Yeah, much better.</p> <p>14 MR. RIEDER: All right. You got me?</p> <p>15 MR. CONWAY: Yeah, loud and clear.</p> <p>16 MR. RIEDER: All right. I have absolutely no</p> <p>17 idea where I was.</p> <p>18 Can you let me know, Mary, where I was, what</p> <p>19 we were discussing?</p> <p>20 I'm actually -- you know what? Never mind. I</p> <p>21 found it.</p> <p>22 So we were talking about -- we're on the</p> <p>23 record. Everybody there?</p> <p>24 MR. CONWAY: Yeah.</p> <p>25 THE WITNESS: Yes.</p>



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

<p>18</p> <p>1 BY MR. RIEDER:</p> <p>2 Q Okay. So what I stated was that, during the</p> <p>3 course of this interview, you were asked what the</p> <p>4 facility would look like a year from now.</p> <p>5 Brahm said, it's not going to be perfect</p> <p>6 because change takes a long time. Is that accurate?</p> <p>7 A Yes.</p> <p>8 MR. RIEDER: Okay. And you were -- you were</p> <p>9 interviewed by the OIG.</p> <p>10 If you want to mark that as the next exhibit;</p> <p>11 it's Report of Contact, 2655, Mary.</p> <p>12 THE REPORTER: 2665?</p> <p>13 MR. RIEDER: Yeah, 2665.</p> <p>14 (Brahm Exhibit H marked for identification.)</p> <p>15 BY MR. RIEDER:</p> <p>16 Q Okay. So if you go to -- if you turn to page</p> <p>17 three, it's 2667 at the bottom. If you just take a</p> <p>18 moment to orient yourself with that, let me know when</p> <p>19 you're familiar.</p> <p>20 A Okay. I'm there.</p> <p>21 Q All right. Okay. I'm looking at -- I'm</p> <p>22 looking at the middle of the page.</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>20</p> <p>1 Q And I assume that they were kind of set in</p> <p>2 their ways?</p> <p>3 A Some were.</p> <p>4 Q Yeah. Did any of them have to be retrained?</p> <p>5 A Yes. Retraining and removing in some cases.</p> <p>6 Q Was any of that retraining or removing</p> <p>7 directed at the dental clinic?</p> <p>8 A There was retraining and removing with this</p> <p>9 incident.</p> <p>10 Q I'm talking about before --</p> <p>11 A Before that?</p> <p>12 Q -- that came to light.</p> <p>13 A There was normal training. That was not one</p> <p>14 of the areas identified in my tenure as the -- as a</p> <p>15 toxic area.</p> <p>16 Q Were there any specific changes that you</p> <p>17 implemented directed at the dental clinic?</p> <p>18 A Well, I think there were changes that applied</p> <p>19 to the dental clinic as well as lots of others.</p> <p>20 For one thing, we did massive amounts of</p> <p>21 psychological safety training, and that is reporting.</p> <p>22 We did a lot of training with civil respect. We did --</p> <p>23 implemented a program called</p> <p>24 VA Voices, which is about listening, and understanding,</p> <p>25 and valuing differences and diversity, which applied to</p>
<p>19</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 Q [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 A [REDACTED]</p> <p>23 Q There were employees that had been there for a</p> <p>24 long time when you took over. Is that correct?</p> <p>25 A Correct.</p>	<p>21</p> <p>1 everyone.</p> <p>2 Q So it sounds like this fear and intimidation</p> <p>3 thing was a very pervasive -- and correct me if</p> <p>4 I'm wrong -- very pervasive feeling throughout the</p> <p>5 facility because you spent a lot of time on</p> <p>6 psychological safety training. Is that accurate?</p> <p>7 A Yes.</p> <p>8 Q Did you have any interaction with the chief of</p> <p>9 dental services?</p> <p>10 A I had some interaction.</p> <p>11 Q Did he report directly to you?</p> <p>12 A No.</p> <p>13 Q Who did he report to?</p> <p>14 A He reported to the associate chief of staff</p> <p>15 from</p> <p>16 Madison service.</p> <p>17 Q And who is that?</p> <p>18 A Dr. Joy Pica.</p> <p>19 Q Did she report to you?</p> <p>20 A No, she would report to the chief of staff.</p> <p>21 Q And who was that?</p> <p>22 A At that time, it was Dr. Sheila Gelman. She</p> <p>23 is retired.</p> <p>24 Q And you still have contact information for</p> <p>25 Dr. Gelman?</p>



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

<p style="text-align: right;">22</p> <p>1 A I suppose human resource may have it. She's 2 out of the state. 3 Q So what was your contact like with 4 Dr. Marcantonio? 5 A It would be at certain meetings; when I did 6 rounds. Not frequent. 7 Q Monthly, weekly? 8 A Monthly might be accurate. 9 Q Did you have any opinion of him as a leader? 10 A I didn't know him well. He was respected by 11 the associate chief of staff for medicine. He seemed 12 very cordial, respectful, to me. 13 Q Do you know what role, if any, he played in 14 hiring Dr. Schiller? 15 A I don't know. He would have been a selecting- 16 - but he would have been a selecting person. 17 Dr. Schiller would have reported directly to 18 him so he would have been the selecting official. 19 Q What's a selecting official? 20 A That is the person -- the person who the 21 employee will report to gets to make the final decision 22 for the hire of that employee, so he would be the final 23 decision maker. 24 Q It was up to him to say, let's hire him; or, 25 no, let's pass on this guy?</p>	<p style="text-align: right;">24</p> <p>1 Q Do they talk to witnesses? Or what kind of 2 things do they do? 3 MR. CONWAY: Bill, can we take a quick break? 4 I can see somebody has joined this conference named 5 Jason Mareno. 6 MR. RIEDER: Jason Mareno is the court 7 reporter here in Miami -- 8 MR. CONWAY: Okay. 9 MR. RIEDER: -- that's supposed to be helping 10 us. I don't know why it says that. 11 MR. CONWAY: Okay. 12 MR. RIEDER: I mean, I don't think he's, like, 13 listening in or anything. Is that a concern or -- 14 MR. CONWAY: Not anymore. It looks like he's 15 gone. 16 MR. RIEDER: He's dropped off. Yeah, I think 17 we're okay. 18 MR. CONWAY: Just to the extent we're getting 19 into confidential things, I don't want somebody 20 else on the line. 21 MR. RIEDER: Right. Okay. 22 All right. Yeah. Go ahead, Mary, if you 23 will, and mark 937. 24 BY MR. RIEDER: 25 Q Before we look at that, though, so what type</p>
<p style="text-align: right;">23</p> <p>1 A Yes. 2 Q Are you aware of Dr. Schiller's background 3 prior to being hired by the VA? 4 A I know he was in the military. 5 Q Are you aware of any adverse events? 6 A I think there was one event where he was, I 7 believe -- well, I don't want to conjecture. 8 There was one event that the medical staff 9 executive board reviewed and felt that he was not at 10 fault, and -- but I don't know. I think it may have 11 been removed. 12 Q Who reviewed it? 13 A There is a medical staff executive committee 14 that reviews all history of any new hire of any new 15 provider and decides if they'll be awarded privileges 16 and what level of privileges, that kind of thing. So 17 they review -- Vetpro, which is a -- it's a database 18 that tracks all tort claims and claims greater than 19 \$100,000.00, those types of things. 20 Q So what type of investigation do they conduct? 21 A Well, they look at any claims, and then they 22 do the research on those claims to see if they were 23 valid, not dropped. You know, sometimes physicians are 24 accused of things and then it's dropped upon 25 investigation.</p>	<p style="text-align: right;">25</p> <p>1 of fact finding is this medical staff executive 2 committee? What kind of fact finding do they do? 3 A I suppose it would be different for any 4 provider. I mean, depending what the issue is. 5 Q I guess I'm trying to get a feel for how deep 6 of a dive it is. Do they actually go out and interview 7 witnesses? Or do they just look at what's online? Do 8 you know? 9 A I don't want to conjecture. I don't believe 10 they talk to witnesses. They look at the case and they 11 look at what happened. I also know that the chief 12 medical officer -- on any cases I believe over 13 \$100,000.00, the chief medical officer at the VISN 14 reviews the case as well. 15 Q What do you mean, over \$100,000.00? 16 A So if you file -- if you lose a tort claim and 17 you have to pay out over \$100,000.00, then you're 18 reported on Vetpro, and that will show up in any 19 application. You're required to say that on applying 20 for a job. 21 Q So do they review these to some extent based 22 on the amount of money that was awarded? 23 A Well, I think they review all the -- the full 24 application, but the Vetpro is a key factor. 25 And I -- I'm not a Vetpro expert, but I</p>



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

<p>26</p> <p>1 believe that the cases that are greater than \$100,000.00</p> <p>2 are mandatorily required to be reported on</p> <p>3 Vetpro. So they absolutely look at those. And then any</p> <p>4 other application -- and they do call references. And I</p> <p>5 know they do -- they do do that very strictly.</p> <p>6 Q So in a tort claim where, say, \$2,500.00 was</p> <p>7 awarded, would that be accorded less potential scrutiny</p> <p>8 than a tort claim where \$100,000.00 was awarded?</p> <p>9 A I don't think so because I've actually seen</p> <p>10 them look at issues with a provider that may have had</p> <p>11 some unrelated charge, and they have made sure that they</p> <p>12 brought it up in the interview, looked into it, called</p> <p>13 references that were not Vetpro issues.</p> <p>14 (Brahm Exhibit I marked for identification.)</p> <p>15 MR. RIEDER: Okay. If you'll take a look at -</p> <p>16 -</p> <p>17 Mary, what did we mark this one?</p> <p>18 THE REPORTER: This is Exhibit I.</p> <p>19 BY MR. RIEDER:</p> <p>20 Q I. If you'll take a look at what's been</p> <p>21 marked as Exhibit I, please.</p> <p>22 A Okay. This is the one I heard about.</p> <p>23 Q Okay. Yeah, so there's two incidences --</p> <p>24 instances, I'll say.</p> <p>25 MR. CONWAY: And, Bill, this is confidential.</p>	<p>28</p> <p>1 A [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 Q [REDACTED]</p> <p>12 A [REDACTED]</p> <p>13 Q [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 A [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 Q [REDACTED]</p> <p>21 A [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 Q [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>
<p>27</p> <p>1 MR. RIEDER: What's that?</p> <p>2 MR. CONWAY: This is a confidential document,</p> <p>3 for the record.</p> <p>4 MR. RIEDER: Oh. Got it. Okay.</p> <p>5 BY MR. RIEDER:</p> <p>6 Q [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 A [REDACTED]</p> <p>12 Q [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 A [REDACTED]</p> <p>15 Q [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 A [REDACTED]</p> <p>19 Q [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 A [REDACTED]</p> <p>23 Q [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>29</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 A [REDACTED]</p> <p>4 Q [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 A [REDACTED]</p> <p>7 Q [REDACTED]</p> <p>8 A [REDACTED]</p> <p>9 Q What's FPPE and OPPE? What do those stand</p> <p>10 for?</p> <p>11 A FPPE is a focused -- oh, I don't know if I --</p> <p>12 FPPE is a focused review providers get. All</p> <p>13 new providers get this. And it means that they're</p> <p>14 monitored in some way; chart review or someone looking</p> <p>15 over their shoulder until there is confidence that their</p> <p>16 practice is safe and follows what we like them to</p> <p>17 follow. And then they're released from FPPE.</p> <p>18 OPPE is the ongoing provider oversight. And</p> <p>19 those are done every six months.</p> <p>20 They're done by chart review of peers and peer</p> <p>21 reviews that go through a peer review committee to</p> <p>22 ensure that the practice that was deemed stable at FPPE</p> <p>23 continues in OPPE. And that's all monitored through the</p> <p>24 medical staff executive committee.</p> <p>25 Q [REDACTED]</p>



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

<p>30</p> <p>1 [REDACTED]</p> <p>2 A [REDACTED]</p> <p>3 Q [REDACTED]</p> <p>4 A [REDACTED]</p> <p>5 Q [REDACTED]</p> <p>6 A [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 Q [REDACTED]</p> <p>10 A [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 Q [REDACTED]</p> <p>14 A [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 Q [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 A [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>32</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 Q At some point, did you task Dr. O'Brien with</p> <p>8 conducting a fact finding?</p> <p>9 A Yes.</p> <p>10 Q And did he draft a report in response to your</p> <p>11 tasking him with that?</p> <p>12 A Yes.</p> <p>13 MR. RIEDER: Okay. Mary, it's 1852.</p> <p>14 (Brahm Exhibit J marked for identification.)</p> <p>15 THE REPORTER: This is letter J.</p> <p>16 MR. RIEDER: Okay.</p> <p>17 MR. CONWAY: And, Bill, this is also</p> <p>18 confidential?</p> <p>19 MR. RIEDER: Okay.</p> <p>20 BY MR. RIEDER:</p> <p>21 Q Turn to page three, if you will. Take a</p> <p>22 moment to orient yourself with the document and let me</p> <p>23 know when you're familiar with it.</p> <p>24 A Okay.</p> <p>25 Q Do you -- how well do you know Dr. O'Brien?</p>
<p>31</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 Q [REDACTED]</p> <p>4 A [REDACTED]</p> <p>5 Q [REDACTED]</p> <p>6 A [REDACTED]</p> <p>7 Q [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 A [REDACTED]</p> <p>11 Q [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 Q [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 A [REDACTED]</p> <p>25 [REDACTED]</p>	<p>33</p> <p>1 A I worked with him at the VISN. Colegally, I</p> <p>2 just know that he was our go-to for any dental issues in</p> <p>3 the region.</p> <p>4 Q What do you think of him as an investigator or</p> <p>5 a fact finder?</p> <p>6 A Well, I think he's got integrity; and I think</p> <p>7 he would -- and he's very good technically, so he would-</p> <p>8 - I would trust his assessment.</p> <p>9 Q [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 A [REDACTED]</p> <p>23 Q [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

<p>34</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 A [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 Q [REDACTED] 17 [REDACTED] 18 A [REDACTED] 19 Q [REDACTED] 20 A [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]</p>	<p>36</p> <p>1 A Roughly. 2 Q [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 Do you think there was adequate supervision in 10 the dental clinic? 11 A It doesn't sound like it. 12 Q Okay. Do you think there was adequate 13 training? 14 A Yes, absolutely. 15 Q Do you think that these employees were 16 adequately trained to report adverse incidents? 17 A I think the training was there, absolutely. 18 They knew what to do. The fact that they 19 didn't do it is a culture issue. 20 Q You think it's a fear of reprisal, 21 intimidation situation? 22 A That is what one of the dental assistants 23 finally came forward with when we investigated this 24 whole situation. 25 Q What do you think?</p>
<p>35</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 Q [REDACTED] 6 [REDACTED] 7 A [REDACTED] 8 Q [REDACTED] 9 [REDACTED] 10 A [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 Q Do you know how long Dr. Schiller's improper 17 infection control practices were alleged to have gone 18 on? 19 A He said January of 20- -- January of 2016. 20 Q Until when? 21 A Until he was removed from the clinic, October. 22 It would be Oct- -- let's see, October '15 he 23 came; January '16 until he was removed, roughly 24 October '17. 25 Q So nine months, a year?</p>	<p>37</p> <p>1 A I believe -- I believe her. I think that they 2 were afraid that -- at least she was afraid to come any 3 further for fear of reprisal. 4 Q And you think that that's a training issue? 5 A I think it's a culture issue. And the 6 training helps. Psychological safety, I have an open 7 door policy myself. We've removed all the leadership. 8 We have brand-new leadership in place that is open. We 9 walked through the area ourselves, you know. And that's 10 one of the reasons when this second dental assistant 11 came forward, that we actually visibly rewarded her 12 because we've got to change that fear. 13 So I think, you know, we were, what, less than 14 a year in. After a year, all our employee survey 15 results showed way -- I mean, we went from 77 to 16 hospital out of, you know, approximately 139 to 48 17 hospital, in quality and best place to work. So I think 18 we're in the middle of shifting the right direction. 19 Unfortunately, not all these employees 20 apparently felt safe. 21 Q Right. And so -- and I'm including the time 22 period and referencing the time period before you 23 arrived and up through the time that 24 Dr. Schiller was breaching these infection control 25 standards and these employees were apparently aware of</p>



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

<p>38</p> <p>1 it. Do you think the VA's permitting of a culture of 2 fear to take place and to exist in the facility -- do 3 you think the 4 VA then bears some responsibility for this incident? 5 A I feel that the senior leadership of the 6 facility should take accountability and that is why they 7 are no longer here. I feel there is. 8 Q All right. 9 A If I allowed that as the current director to 10 occur, that would not be right. I feel like the 11 director, chief of staff were highly accountable for 12 this. 13 Q So the VA employees' former leadership? 14 A Yes. I think leadership has -- 15 Q All right. 16 A -- an obligation to create that culture. 17 Q And they created a culture of fear and a 18 culture of intimidation as opposed to a culture where if 19 you see something, you say something; if you see an 20 adverse event, you report it? 21 A Correct. 22 Q Is that accurate? 23 Okay. 24 A Yes. 25 Q Do you think that would have prevented this</p>	<p>40</p> <p>1 through, I'll briefly go through this. So this is the 2 VA OIG inspection report. Have you seen that report? 3 A Yes. 4 Q Okay. I'm going to read briefly from it. It 5 says, we identified two factors that contributed to the 6 facility of leadership not being aware sooner. Dentist 7 A's improper of infec- -- excuse me -- 8 THE REPORTER: I'm sorry. I can't understand. 9 You're reading too fast. 10 MR. RIEDER: Okay. I'm sorry. I'm from the 11 big city. We talk really fast. 12 MR. CONWAY: What city is that? 13 MR. RIEDER: Ready? 14 THE REPORTER: Yes. 15 MR. RIEDER: All right. 16 BY MR. RIEDER: 17 Q We identified two factors that contributed to 18 facility leadership not being aware sooner of 19 Dentist A's improper infection control 20 practices. These factors included: (1) failure of the 21 staff, despite safety and infection control training, to 22 report Dentist A's breach of infection control 23 practices. And then it goes on, (2) advance 24 notification and other issues associated with the Dental 25 Clinic inspections.</p>
<p>39</p> <p>1 incident? 2 A It would be a conjecture to say that; however, 3 had people come forward, perhaps a look higher than 4 Marcantonio would have occurred. I don't know what Dr. 5 Marcantonio reported up the chain. 6 Certainly it did not get to my level. 7 Q So a look higher would have been Dr. Pica? 8 A Yes. 9 Q If Dr. Pica knew about this, you think she 10 would have let it go? 11 A No. 12 Q Okay. She would have prevented it? 13 A I think so. She has a lot of integrity. 14 Q Do you know if Dr. O'Brien's -- strike that. 15 Do you know if Dr. O'Brien conducted 16 inspections at the dental clinic? 17 A That is required. I don't know how often. At 18 least, annually the VISN is supposed to be looking at 19 that dental clinic. And there -- I know that they did 20 have a dental inspection while I was here. Dr. O'Brien 21 met with me once to go over some dental findings. 22 Q Do you know if his inspections were announced 23 or unannounced? 24 A I don't know. 25 Q Instead of giving you another document to read</p>	<p>41</p> <p>1 THE REPORTER: Were you saying Dentist 2 A's? 3 MR. RIEDER: Dentist A, yeah. So they're 4 referred to in the report as Dentist A. 5 THE REPORTER: Okay. 6 MR. CONWAY: Victoria, do you want to see that 7 in writing? 8 If that would be easier. 9 MR. RIEDER: That's certainly fine. 10 If you want to take a peek at it before we 11 discuss it. 12 We've marked it before. Mary, it's the one 13 with the big seal on it. It says healthcare 14 inspection. 15 BY MR. RIEDER: 16 Q So it starts on the bottom of page six and 17 goes over to page seven. Just take all the time you 18 need to familiarize yourself with it. 19 A Okay. I'm familiar. 20 Q So the OIG apparently in investigating this 21 incident determined that Dr. O'Brien announced his -- 22 when his inspections were going to take place. Do you 23 think that if his inspections had not been announced, 24 Dr. Schiller's actions could have been uncovered 25 earlier?</p>



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

<p style="text-align: right;">42</p> <p>1 MR. CONWAY: Objection, assumes facts.</p> <p>2 Go ahead.</p> <p>3 THE WITNESS: It's possible that they would</p> <p>4 have found his burs, his personally owned</p> <p>5 equipment, because that's part of any inspection is</p> <p>6 to look for personally owned equipment.</p> <p>7 BY MR. RIEDER:</p> <p>8 Q So, yeah, it's possible?</p> <p>9 A It's possible.</p> <p>10 Q Okay. How about his lack of use of personal</p> <p>11 protective equipment? Is that something else they may</p> <p>12 have seen?</p> <p>13 A They may have. It's my understanding, though,</p> <p>14 that, at this point, after looking at this, that the</p> <p>15 staff often reminded him, so I don't know if they would</p> <p>16 have seen him not do it, or if the staff would --</p> <p>17 Q You're talking about the inspections? Or</p> <p>18 they--</p> <p>19 A No --</p> <p>20 Q -- would remind him to --</p> <p>21 A Remind him to put on your gown, or reminded</p> <p>22 him afterward. After finding out about this, I did some</p> <p>23 inquiry to find out how could this happen.</p> <p>24 And I guess there was -- I was told there was</p> <p>25 quite a bit of nagging going on, like, please do this,</p>	<p style="text-align: right;">44</p> <p>1 Q At some point while working for the VA, did</p> <p>2 you become concerned about David Houlihan's actions?</p> <p>3 A Yes, I did.</p> <p>4 Q Did you raise it up the chain of command?</p> <p>5 A Yes, I did.</p> <p>6 Q Who did you tell?</p> <p>7 A I told the network director of VISN 12.</p> <p>8 Q At some point did you say that wasn't -- you</p> <p>9 didn't have enough evidence to say he was really going</p> <p>10 to kill something -- someone; it wasn't strong enough to</p> <p>11 say, I'm calling the press.</p> <p>12 Did you say that?</p> <p>13 A I don't remember quite saying that. I asked</p> <p>14 for an investigative board. I was told that the</p> <p>15 evidence was not strong enough.</p> <p>16 Q All right. Lori Cleaver claims that she went</p> <p>17 to</p> <p>18 Sara Wagner, who she thought was her supervisor, and</p> <p>19 Sara Wagner said he'll get caught sooner or later. Is</p> <p>20 that your understanding?</p> <p>21 A Yes, I believe she did say that.</p> <p>22 Q Okay. Was that kind of what happened to you</p> <p>23 when you tried to get David Houlihan ousted?</p> <p>24 A Well, I didn't sit and do nothing. I actually</p> <p>25 took other mechanisms, launched focused peer reviews.</p>
<p style="text-align: right;">43</p> <p>1 please put your gloves on, so I'm not sure the staff let</p> <p>2 him get away with it, but they didn't report it up.</p> <p>3 Q Right.</p> <p>4 So they knew about it for a long period of</p> <p>5 time?</p> <p>6 A I don't know how long, but apparently -- well,</p> <p>7 apparently. I don't know exactly how long he was not</p> <p>8 doing this, but he did admit he was using his burs since</p> <p>9 January.</p> <p>10 Q Do you think the VA should have fired</p> <p>11 Dr. Schiller once it became apparent that he was</p> <p>12 breaching these infection control standards?</p> <p>13 A Absolutely.</p> <p>14 Q [REDACTED]</p> <p>15 A [REDACTED]</p> <p>16 Q [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 A [REDACTED]</p> <p>19 Q [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 A [REDACTED]</p> <p>22 Q Do you think she bears some responsibility for</p> <p>23 this?</p> <p>24 A She bears responsibility, but she did report</p> <p>25 it to who she thought was a lead.</p>	<p style="text-align: right;">45</p> <p>1 There were multiple actions that I took.</p> <p>2 Q When did he finally get removed? Was it after</p> <p>3 Jason Simcakoski passed away?</p> <p>4 A Yes.</p> <p>5 Q Why didn't you feel like you could call the</p> <p>6 press?</p> <p>7 A I did move it up my chain of command. And,</p> <p>8 actually, Dr. Murawsky, technically, if you look at peer</p> <p>9 reviews, his peer reviews did not come back with a large</p> <p>10 number of level threes, which would have been strong</p> <p>11 enough to launch administrative boards. So it was a</p> <p>12 call. My gut instinct was that we had a bad trend here.</p> <p>13 So what we did is move forward, a group of us,</p> <p>14 and we instituted new policies at</p> <p>15 Tomah which would prevent Dr. Houlihan from being able</p> <p>16 to do things like early refills of narcotics, which</p> <p>17 would require him to do urine drops, which would put him</p> <p>18 in the limelight so he wouldn't be able to, you know, do</p> <p>19 the practice that, you know, we were concerned he may be</p> <p>20 doing until we could get enough evidence.</p> <p>21 Our evidence just wasn't strong enough. It</p> <p>22 was a kind of a feeling that the trend was in a wrong</p> <p>23 direction. There were multiple complaints from</p> <p>24 employees. We did work with the IG very closely, too.</p> <p>25 And I let them know everything that was occurring.</p>



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

<p style="text-align: right;">46</p> <p>1 Q Do you know where Dr. Schiller is now?</p> <p>2 A No.</p> <p>3 Q Do you think that opioid overprescription is</p> <p>4 still an issue at the Tomah VA?</p> <p>5 A No.</p> <p>6 Q I'm looking for another document.</p> <p>7 Would it surprise you if I told you that Dr.</p> <p>8 Schiller's license was suspended for unlawful use,</p> <p>9 abuse, and possession of pain killers and anxiety</p> <p>10 medicine?</p> <p>11 A When? Before this incident? Yes, it would</p> <p>12 surprise me.</p> <p>13 Q After this incident.</p> <p>14 After the incident. Did you hear me?</p> <p>15 A Yes, I did.</p> <p>16 Yeah, I guess I'm surprised.</p> <p>17 Q Okay. Has anybody looked into whether</p> <p>18 Dr. Schiller filled any prescriptions for himself at the</p> <p>19 Tomah VA?</p> <p>20 MR. CONWAY: I'm going to object on relevance</p> <p>21 grounds. You know, I'm not sure where you're going</p> <p>22 on this.</p> <p>23 MR. RIEDER: Well, okay. You can object, but,</p> <p>24 subject to me continuing to --</p> <p>25 MR. CONWAY: Yeah, but I'm going to start</p>	<p style="text-align: right;">48</p> <p>1 You want to object, that's certainly fine and</p> <p>2 I'll continue with my examination; we can have it</p> <p>3 ruled on later, but I'm not -- I'm telling her, in</p> <p>4 light of these facts -- fine, forget these facts.</p> <p>5 BY MR. RIEDER:</p> <p>6 Q I just want to know if anybody investigated</p> <p>7 whether or not he filled any prescriptions for himself</p> <p>8 at the Tomah VA.</p> <p>9 A We have strict oversight of our narcotics, so</p> <p>10 he can't -- he can't fill any for himself. That would</p> <p>11 have been noted. We have so many levels of oversight of</p> <p>12 our opioid. And, if he would have tried to fill one for</p> <p>13 himself, I'm sure that would have been caught.</p> <p>14 Q Did he have sufficient permission and</p> <p>15 credential to write prescriptions?</p> <p>16 A I don't know his privileges offhand, but he</p> <p>17 would have strict dental privileges and whatever</p> <p>18 medications would go along with the dental service. And</p> <p>19 if he was not doing -- it depends on the procedures he</p> <p>20 was doing, what he would be able to order, so that would</p> <p>21 be a privilege question. And I'm not -- I don't know</p> <p>22 his privileges.</p> <p>23 Q As a nurse, do you think that sleeping during</p> <p>24 work hours could be a symptom of the use or abuse of</p> <p>25 pain medication or anxiety medication?</p>
<p style="text-align: right;">47</p> <p>1 objecting more strenuously unless there's a clear</p> <p>2 tie to this case.</p> <p>3 MR. RIEDER: Well, I think the tie is pretty</p> <p>4 clear. It's been noted in multiple investigations</p> <p>5 and the media that there was an opioid issue at the</p> <p>6 facility. Dr. Schiller, who was apparently</p> <p>7 sleeping at his desk during clinical hours and</p> <p>8 breaching infection control standards for over a</p> <p>9 year, has now lost his license or has his license</p> <p>10 suspended because of the use of, and abuse of,</p> <p>11 multiple medications, including pain medicine and</p> <p>12 anti-anxiety medicine, so I just want to know if he</p> <p>13 filled any of those prescriptions at the Tomah VA;</p> <p>14 maybe it's something that the Tomah VA should have</p> <p>15 investigated. So do we know the answer if anybody</p> <p>16 investigated that?</p> <p>17 MR. CONWAY: Objection. You're putting a</p> <p>18 bunch of facts out there and asking her to assume</p> <p>19 they're true and answer your question. If you want</p> <p>20 to show her a document, if you want to show her</p> <p>21 evidence, go ahead, but --</p> <p>22 MR. RIEDER: Yeah, that's -- okay.</p> <p>23 Now, that's why I instructed her not to answer</p> <p>24 because here it's indicated there's not a proper</p> <p>25 basis for you to instruct her not to answer.</p>	<p style="text-align: right;">49</p> <p>1 A It could be a lot of things. It could be.</p> <p>2 Q It could be?</p> <p>3 A It could be. It could be a lot of things.</p> <p>4 Q Were you aware that Dr. Schiller was on the</p> <p>5 pain committee?</p> <p>6 A I wasn't.</p> <p>7 Q What is the pain committee?</p> <p>8 A We have a couple of committees. One committee</p> <p>9 is the pain committee and the oversight pain protocols,</p> <p>10 pain guidelines, pain policies for the hospital. They</p> <p>11 work very closely with the opioid safety committee,</p> <p>12 which looks at any case of opioids that are bad</p> <p>13 combinations or high doses.</p> <p>14 Q And he was on that committee?</p> <p>15 A He was on the pain committee. I don't know</p> <p>16 that he was on the opioid committee; two different</p> <p>17 committees.</p> <p>18 Q Who would know that?</p> <p>19 A Stacy Williams is our chair of both of those</p> <p>20 committees. She's the associate director.</p> <p>21 Q Were you aware that he was on the infection</p> <p>22 control committee?</p> <p>23 A I wasn't.</p> <p>24 Q And that he was supposed to be overseeing hand</p> <p>25 hygiene. Had you heard that before?</p>



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

<p style="text-align: right;">50</p> <p>1 A I don't think -- I don't remember hearing</p> <p>2 that.</p> <p>3 It only lets me know he should have known</p> <p>4 better then.</p> <p>5 Q Do you know who appointed him or how he got on</p> <p>6 the infection control committee and the pain committee?</p> <p>7 A No.</p> <p>8 Q How does that -- how does someone generally</p> <p>9 get appointed or become a member of the committee?</p> <p>10 A Well, usually the chair -- each committee has</p> <p>11 a charter. And, based on the charter, they're</p> <p>12 recommended members. So if, for instance, they wanted--</p> <p>13 the chair felt there needed to be a representative from</p> <p>14 dental, the dental chief would be contacted and asked</p> <p>15 for a member.</p> <p>16 Q Dr. Marcantonio?</p> <p>17 A Right.</p> <p>18 Q Do you know if anyone from the dental clinic</p> <p>19 ever advised anybody from the infection control</p> <p>20 committee that Dr. Schiller was breaching infection</p> <p>21 control standards on an ongoing basis?</p> <p>22 A Not that I'm aware of.</p> <p>23 MR. RIEDER: All right. Mary, if you'll grab</p> <p>24 that letter that says Department of</p> <p>25 Veterans Affairs on top, let's mark that as the next</p>	<p style="text-align: right;">52</p> <p>1 letter out to the veterans?</p> <p>2 A Many things happened immediately upon knowing</p> <p>3 this so protocol was followed. Dentist immediately</p> <p>4 removed. We had to actually do a risk assessment and an</p> <p>5 investigation to show what the risk was. After the full</p> <p>6 risk assessment was completed, central office has</p> <p>7 experts that look at this as well to make sure that when</p> <p>8 we say it's low risk or very low risk, you know, we were</p> <p>9 saying something that we could back up with evidence.</p> <p>10 Q So you were saying it was very low risk or --</p> <p>11 A This one says low risk.</p> <p>12 Q -- we believe your risk of infection is low,</p> <p>13 you believe that as of November 29, 2016?</p> <p>14 A Absolutely.</p> <p>15 MR. RIEDER: Mary, will you mark 4167?</p> <p>16 (Brahm Exhibit L marked for identification.)</p> <p>17 MR. CONWAY: It looks like we have a</p> <p>18 confidential document, Bill.</p> <p>19</p> <p>20 BY MR. RIEDER:</p> <p>21 Q Okay. Please turn to page three, take a</p> <p>22 moment to orient yourself with it, and let me know when</p> <p>23 you're familiar, please.</p> <p>24 A Okay. I read it.</p> <p>25 Q [REDACTED]</p>
<p style="text-align: right;">51</p> <p>1 exhibit, please.</p> <p>2 (Brahm Exhibit K marked for identification.)</p> <p>3 BY MR. RIEDER:</p> <p>4 Q All right. Just take moment to orient</p> <p>5 yourself with the letter and let me know when you're</p> <p>6 familiar with it.</p> <p>7 A I'm familiar with the letter.</p> <p>8 Q Did you draft the letter?</p> <p>9 A A group of us worked together to draft the</p> <p>10 letter. We had to get approval from central office on</p> <p>11 what we were going to send out and work with public</p> <p>12 affairs, so I didn't write it myself; I was part of it.</p> <p>13 Q Is that your signature at the end of it?</p> <p>14 A Yes.</p> <p>15 Q Who else worked on it?</p> <p>16 A Public affairs, our public affairs officer.</p> <p>17 The central office reviewed it. The VISN reviewed it.</p> <p>18 Q Did you consult with a lawyer?</p> <p>19 A I'm sure general counsel reviewed it.</p> <p>20 Q What is the -- what's the date on the letter?</p> <p>21 A November 29.</p> <p>22 Q When did you first learn about the infection</p> <p>23 control breaches in the dental clinic?</p> <p>24 A October 21.</p> <p>25 Q Why did it take more than a month to send a</p>	<p style="text-align: right;">53</p> <p>1 A [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 Q [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 A [REDACTED]</p> <p>14 Q [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 A [REDACTED]</p> <p>21 Q [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 A [REDACTED]</p> <p>24 Q [REDACTED]</p> <p>25 [REDACTED]</p>



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

<p>54</p> <p>1 A [REDACTED]</p> <p>2 Q [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 A [REDACTED]</p> <p>7 Q So on November 29, you guys had information</p> <p>8 stating that the risk was high, didn't you?</p> <p>9 A We had information, newer information stating</p> <p>10 the risk was low. We had a local risk assessment that</p> <p>11 was approved and done by experts as well. So that is</p> <p>12 not in here. And that went through big detail about --</p> <p>13 and everything was deemed low risk and very low risk.</p> <p>14 Q Who drafted that?</p> <p>15 A That was done by our infection control people</p> <p>16 here, Melissa Moore was the key author.</p> <p>17 Q Melissa Moore's report was done on</p> <p>18 October 21, 2016, wasn't it?</p> <p>19 A I don't know the date of the report offhand.</p> <p>20 Q Here. I'll grab it for you.</p> <p>21 A Keep in mind that many meetings occur here and</p> <p>22 then key experts weigh in, so more information was</p> <p>23 known. By the time we wrote the letter, we knew it was</p> <p>24 low and very low.</p> <p>25 Q Well, the letter doesn't say very low, though,</p>	<p>56</p> <p>1 Q Emotional distress?</p> <p>2 MR. CONWAY: Objection, calls for speculation.</p> <p>3 BY MR. RIEDER:</p> <p>4 Q You can answer the question.</p> <p>5 A Some people. I can't speak for --</p> <p>6 Q Would you have been distressed upon learning</p> <p>7 that you may have been exposed to deadly viruses?</p> <p>8 A See, I knew more details. Being a nurse, I</p> <p>9 know the details that the bur actually doesn't break</p> <p>10 tissue. In very, very, very few cases, the risk is so</p> <p>11 low. I would have probably had high emotional distress</p> <p>12 knowing the facts. Now, lay people not knowing the</p> <p>13 facts, you know, it's a different story.</p> <p>14 Q Would you have gotten tested?</p> <p>15 A Yes.</p> <p>16 Q Yes, you would have?</p> <p>17 A I would have. Why not?</p> <p>18 MR. RIEDER: Mary, 1678. If you could find</p> <p>19 that one, I believe we referred to earlier.</p> <p>20 (Discussion off the record.)</p> <p>21 MR. CONWAY: Again, confidential.</p> <p>22 MR. RIEDER: Yes.</p> <p>23 BY MR. RIEDER:</p> <p>24 Q If you'll look at what's been marked as</p> <p>25 Exhibit A, please turn to Page 10, and let me know when</p>
<p>55</p> <p>1 does it?</p> <p>2 A There were two different letters. One that</p> <p>3 went to patients that had bridge and crown work who were</p> <p>4 low risk; and one who went to patients that had no</p> <p>5 bridge or crown work and they were very low risk.</p> <p>6 Q Is that the only change in the letter? One</p> <p>7 said low, one said very low?</p> <p>8 A To my knowledge, yes. They were all offered</p> <p>9 the same labs, the same followup. What we were trying</p> <p>10 to do was be extremely transparent so that we could try</p> <p>11 and allay the fear as much as possible.</p> <p>12 Q Do you think that made a big difference to</p> <p>13 somebody receiving a letter, whether it said very low or</p> <p>14 low risk in terms of them having been infected to a</p> <p>15 deadly virus?</p> <p>16 A No. I think what could allay the fear is the</p> <p>17 fact that we offered all the testing for free, as well</p> <p>18 as genomic testing to assure that they did not contract</p> <p>19 anything. It's better than doing nothing.</p> <p>20 Q It's definitely better than doing nothing, but</p> <p>21 would you say that my fear -- or, that someone's fear</p> <p>22 would be allayed that they may have been exposed to a</p> <p>23 deadly virus because they were offered free testing?</p> <p>24 A No, I'm sure anxiety would be present in some</p> <p>25 people.</p>	<p>57</p> <p>1 you're familiar with it.</p> <p>2 A Okay. I'm familiar.</p> <p>3 Q Okay. Is this the report you were talking</p> <p>4 about from Melissa Moore, the risk assessment?</p> <p>5 A Yeah, this is.</p> <p>6 Q Okay. What was the date on this?</p> <p>7 A 10-31. I think one needs to note, too, that</p> <p>8 more information comes to light; for instance, the fact</p> <p>9 that the virus was used, so there was, like, no -- there</p> <p>10 wasn't, like, no sterilization. More and more</p> <p>11 information kept coming to light.</p> <p>12 Q Is it 10-31 or 10-21?</p> <p>13 A Oh, let me look again. I'm getting old. 10-</p> <p>14 31 -- oh, this is Dr. O'Brien. Okay.</p> <p>15 Q I'm on page ten.</p> <p>16 A Oh, 10-21; gotcha.</p> <p>17 Q Okay. So were you aware of any risk</p> <p>18 assessments that were reduced to writing in an event</p> <p>19 between 10-21 and November 7 when the CERT issued this</p> <p>20 report?</p> <p>21 A There was much information. There may not</p> <p>22 have been a formal risk assessment, but lots of</p> <p>23 discussion about risk, and what was done, what wasn't</p> <p>24 done, and what was the risk. So when we wrote the</p> <p>25 letter, we were told that it was low risk and very low</p>



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

<p>58</p> <p>1 risk.</p> <p>2 Q [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 A [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 Q [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 A [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 Q [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 A [REDACTED]</p> <p>25 [REDACTED]</p>	<p>60</p> <p>1 have been exposed to a deadly virus?</p> <p>2 MR. CONWAY: Objection, asked and answered.</p> <p>3 BY MR. RIEDER:</p> <p>4 Q You can answer.</p> <p>5 A Yes.</p> <p>6 Q Okay. Do you think their spouses and loved</p> <p>7 ones would be frightened?</p> <p>8 MR. CONWAY: Objection, calls for speculation.</p> <p>9 THE WITNESS: Yes, they could be.</p> <p>10 BY MR. RIEDER:</p> <p>11 Q [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 A [REDACTED]</p> <p>16 Q [REDACTED]</p> <p>17 A [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 Q [REDACTED]</p> <p>24 A [REDACTED]</p> <p>25 [REDACTED]</p>
<p>59</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 Q [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 A [REDACTED]</p> <p>7 Q All right. Taking a look back at this letter,</p> <p>8 the one that went out to the veterans, the second</p> <p>9 sentence, it says this letter is to inform you that</p> <p>10 established infection control practices were not being</p> <p>11 followed by the dentist that treated you. Is that true?</p> <p>12 A Yes.</p> <p>13 Q Turn over to the second page. The first</p> <p>14 sentence in the last paragraph, could you read that for</p> <p>15 me?</p> <p>16 A As the acting medical center director, let me</p> <p>17 sincerely apologize for the concern that this</p> <p>18 notification may bring to you and your family.</p> <p>19 Q You knew you were delivering bad news --</p> <p>20 A Yes.</p> <p>21 Q -- correct?</p> <p>22 A Yes.</p> <p>23 Q You knew they'd be frightened?</p> <p>24 A It could be frightening, yes.</p> <p>25 Q It could be frightening to learn that you may</p>	<p>61</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 Q [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 A [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 Q [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 Q [REDACTED]</p> <p>24 A [REDACTED]</p> <p>25 [REDACTED]</p>



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

<p>62</p> <p>1 [REDACTED]</p> <p>2 Q [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 A [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 Q [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 A [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 Q [REDACTED]</p> <p>12 A [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 Q [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 A [REDACTED]</p> <p>21 Q [REDACTED]</p> <p>22 A [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>64</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 Q [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 A [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 Q [REDACTED]</p> <p>11 A [REDACTED]</p> <p>12 MR. RIEDER: Okay. Just give me one minute.</p> <p>13 Let me look at my notes. I think we're about done.</p> <p>14 All right. Thank you, Ms. Brahm.</p> <p>15 I've got no further questions.</p> <p>16 THE WITNESS: Thank you.</p> <p>17 MR. CONWAY: I might have a few questions,</p> <p>18 though I just need a -- just a minute to look at my</p> <p>19 notes quickly.</p> <p>20 MR. RIEDER: Then I may have more questions.</p> <p>21 (Discussion off the record.)</p> <p>22 BY MR. CONWAY:</p> <p>23 Q Ms. Brahm, at the beginning of the deposition,</p> <p>24 I think you made a comment along the lines of there was</p> <p>25 a negligent dentist and I think you were referring to</p>
<p>63</p> <p>1 Q [REDACTED]</p> <p>2 A [REDACTED]</p> <p>3 Q [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 A [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 Q [REDACTED]</p> <p>10 A [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 Q [REDACTED]</p> <p>13 A [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 Q [REDACTED]</p> <p>20 A [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 Q [REDACTED]</p> <p>23 A [REDACTED]</p> <p>24 Q [REDACTED]</p> <p>25 A [REDACTED]</p>	<p>65</p> <p>1 Dr. Schiller. Do you recall saying something like that?</p> <p>2 A Yes.</p> <p>3 Q Now, you're not a legally trained individual,</p> <p>4 correct?</p> <p>5 A No.</p> <p>6 Q So when you use the term negligent, you don't</p> <p>7 understand the meaning that --</p> <p>8 A No, I don't.</p> <p>9 Q So you're not aware of the meaning of</p> <p>10 negligence within the context of the legal world. Is</p> <p>11 that fair to say?</p> <p>12 A Yes.</p> <p>13 Q Okay. I think you also made a comment about</p> <p>14 how maybe it sounded like Dr. Marcantonio provided</p> <p>15 inadequate supervision in the dental clinic. Do you</p> <p>16 recall saying something along those lines?</p> <p>17 A Yes.</p> <p>18 Q Now, you don't know firsthand what type of</p> <p>19 supervision Dr. Marcantonio specifically provided during</p> <p>20 Dr. Schiller's tenure. Is that fair to say?</p> <p>21 A Yes.</p> <p>22 Q You also mentioned that -- I think there was</p> <p>23 something about there was somewhat of a toxic culture in</p> <p>24 the VA when you arrived. And that may have affected why</p> <p>25 certain employees in the dental clinic didn't report</p>



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

Brahm, Victoria 09-25-2018

<p style="text-align: right;">66</p> <p>1 this conduct, this alleged conduct sooner. Do you 2 remember that? 3 A Yes. 4 Q Again, you don't know what the particular 5 employees at issue in this case were thinking at the 6 time or you don't have firsthand knowledge of that. Is 7 that correct? 8 A Correct. I can't definitively say there was a 9 correlation. 10 MR. CONWAY: That's all I've got, Bill. 11 EXAMINATION 12 BY MR. RIEDER: 13 Q Okay. I've got a question. Ms. Brahm, what 14 do you think negligent means? 15 A I know what I meant to say. My intent was 16 that this dentist knew our policies and purposely did 17 not follow them. 18 Q Okay. What do you think negligent means, just 19 generally speaking? 20 A Well, negligent means didn't -- well, didn't 21 follow the right procedures; did something that you knew 22 better than to do. 23 I'm not making sense. 24 Q So your definition of negligent is to do -- 25 is,</p>	<p style="text-align: right;">68</p> <p>1 She can have -- 2 MR. RIEDER: I didn't understand. 3 Okay. Well, I move to strike the first answer 4 because I didn't understand what her answer was, so 5 I'm asking again. 6 MR. CONWAY: Wait. You're striking a witness' 7 answer because you didn't like it? 8 MR. RIEDER: No, I didn't say I didn't like 9 it. I said I didn't understand it. 10 MR. CONWAY: Would you like to hear it again? 11 MR. RIEDER: I'd like to hear what she has to 12 say. Let's just hear from the witness. 13 The rules don't provide for this kind of back 14 and forth. She can give me an answer and we'll let 15 it stand. 16 MR. CONWAY: My objection stands. 17 MR. RIEDER: Yup. 18 THE WITNESS: My answer was that negligence in 19 this case was defined by this dentist not following 20 policies that he knew to be present. He didn't 21 follow policy, so I was defining that as 22 negligence. 23 MR. RIEDER: All right. Fair enough. 24 No further questions. 25 MR. CONWAY: Okay. And, Ms. Brahm, the rules</p>
<p style="text-align: right;">67</p> <p>1 I'm sorry, what is it again? 2 MR. CONWAY: Objection, asked and answered. 3 THE WITNESS: I think there's probably -- 4 MR. RIEDER: I'm not sure that I understood 5 the first answer, so I want to hear the second one. 6 MR. CONWAY: Can you read it back to him, 7 please? 8 MR. RIEDER: No, no, I want to hear what she 9 has to say. Your objection is asked and answered; 10 noted for the record. 11 THE WITNESS: I failed -- 12 MR. CONWAY: Do you want to hear your previous 13 answer back? 14 THE WITNESS: Sure. 15 MR. RIEDER: Well, well, just a minute, just a 16 minute. Now we're entering the realm of coaching. 17 I don't want this to degenerate. Everything's been 18 very nice which is nice, but I'd like to hear what 19 your counsel has objected for the record this is 20 asked and answered. I'd like to hear what your 21 definition of negligence is. Since you elected to 22 say that he was a negligent doctor, I didn't ask 23 you -- 24 MR. CONWAY: Bill, she's giving you an answer 25 point blank to that very same question.</p>	<p style="text-align: right;">69</p> <p>1 allow you, if you elect to do so on the record, a 2 30 day period to review your transcript once it 3 becomes available and to revise it as needed upon 4 your review. But you have to elect whether you 5 want to do so on the record if you'd like to. 6 THE WITNESS: Yes, I do. 7 MR. CONWAY: That's all we've got. 8 MR. RIEDER: All right. Thank you for your 9 testimony, Ms. Brahm. 10 (Whereupon, the deposition of 11 Victoria Brahm was terminated.) 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>



Brahm, Victoria 09-25-2018

70

1 CERTIFICATE OF REPORTER
2 UNITED STATES DISTRICT COURT
3 FOR THE WESTERN DISTRICT OF WISCONSIN
4
5 I, Mary P. Hader, Registered Professional
Reporter and CSR, certify:
6 That the foregoing proceedings were taken before me at
the time and place therein set forth, at which time the
7 witness was put under oath by me;
That the testimony of the witness, the questions
8 propounded, and all objections and statements made at he
time of the examination were recorded stenographically
9 by me and thereafter transcribed;
That a review of the transcript by the deponent was
10 requested; That the foregoing is a true and correct
transcript of my shorthand notes so taken.
11 I further certify that I am not a relative or employee
of any attorney of the parties, nor financially
12 interested in the action.
13 I declare under penalty of perjury under the laws
of Wisconsin that the foregoing is true and correct.
14
15 Dated this 10th day of OCTOBER, 2018.
16
17
18
19
20 _____
Mary P. Hader, RPR, CSR
21
22
23
24
25



UNIVERSAL
COURT REPORTING

877.291.3376
www.UCRinc.com

<u>\$</u>	<u>2</u>	<u>37</u> 11:17	45:15,18
\$100,000.00	2 40:23	3815A 1:18	48:20 61:24
23:19	2:40 1:19	<u>4</u>	about 8:5,12
25:13,15,17	20 35:19	4:00 1:19	12:6 15:18,25
26:1,8	200 19:1	408 1:18	16:23 17:22
\$2,500.00 26:6	2004 12:14,16	4167 52:15	20:10,24
27:10	2006 12:16,17	48 37:16	26:22 27:25
<u>1</u>	2015 12:24	<u>5</u>	28:23 31:22
1 40:20	14:20 18:24	5 3:3	34:21 39:9
10 56:25 57:13	2016 4:7 35:19	500 1:18	42:10,17,22
10-21	52:13 53:12	51 4:7	43:4 44:2
57:12,16,19	54:18 58:2	52 4:8	51:22 54:12
58:2	2018 1:19 5:2	53089 5:14	57:4,23 64:13
10-31 57:7,12	70:15	53703 2:9	65:13,23
10th 70:15	21 51:24 54:18	<u>6</u>	above-entitled
12 11:19 44:7	222 2:9	6 5:16	1:16
53:15	25 1:19 5:2	67 3:5	absolutely
12-21 58:14	12:9	69 3:5,6	17:16 26:3
13 4:3	26 4:5	<u>7</u>	32:4 36:14,17
139 37:16	2655 18:11	7 53:12 57:19	43:13 52:14
15 15:4 35:22	2665 18:12,13	700 2:9	abuse 46:9
16 35:23	2667 18:17	72 3:6	47:10 48:24
1678 56:18	29 4:7 51:21	77 37:15	accorded 26:7
17 35:24	52:13 54:7	<u>9</u>	according
17-CV-823 1:2	29th 54:1	90 30:11 34:23	27:16
18 4:4	<u>3</u>	9-20-16 58:3	accordingly
1852 32:13	30 69:2	937 24:23	34:7 35:14
1855 33:24	307 2:4	<u>A</u>	accountability
1958 5:16	31 57:14	able 15:19	38:6
1981 12:11	32 4:6		accountable
1997 27:7	3250 2:4		38:11
1998 27:13	33133 2:4		accurate 14:10
1999 27:13			15:16 18:6
			21:6 22:8
			31:9 38:22
			accurately
			53:21
			accused 23:24



across 16:11	advised 50:19	30:24 31:19	70:11
act 9:22	affairs 50:25	32:6 33:9	AMERICA 1:10
acting 7:24	51:12,16	37:7,14,19	amount 25:22
12:21 30:16	affected 65:24	38:8,15 40:15	amounts 20:20
59:16	afraid 37:2	41:17 44:16	anesthesia
action 1:16	after 8:13	50:23 51:4	28:4,7
35:7 70:12	19:10	52:25 53:6	announced
actions 7:2	27:12,23	55:8,17 59:7	39:22
41:24 44:2	33:12 37:14	60:17,25 61:3	41:21,23
45:1	42:14,22 45:2	63:13 64:3,14	annually 39:18
actively 13:11	46:13,14 52:5	66:10 68:23	another 7:17
actual 8:8	60:17	69:7,8 70:8	39:25 46:6
28:15	afterward	allay 55:11,16	60:24
actually 12:16	42:22	allayed 55:22	answer
17:20 25:6	again 16:9	allegation	8:16,18,21,25
26:9 27:15	27:13 28:17	6:11	47:15,19,23,2
37:11 44:24	56:21 57:13	allegations	5 56:4 58:20
45:8 52:4	66:4 67:1	6:13,14,15,18	60:4
56:9 58:8,25	68:5,10	7:22	67:5,13,24
63:14	against 6:11	allege 9:8	68:3,4,7,14,1
acute 62:13	7:22 9:5	alleged 35:17	8
added 58:15	14:23 15:8	66:1	answered 60:2
addendum 54:2	agree 16:4	alleging 27:9	67:2,9,20
58:15	29:2 35:5,9	allow 69:1	anti-anxiety
addition 12:20	ahead 19:9	allowed 38:9	47:12
address 5:12	24:22 42:2	along 48:18	anxiety 46:9
adequate	47:21	64:24 65:16	48:25 55:24
36:9,12	aid 62:3	also 12:17	any 6:10 8:22
adequately	all 1:7 8:14	25:11 30:25	9:19 10:18
36:16	9:4,21 10:12	32:17	11:15 12:12
administrative	11:3,15 13:16	65:13,22	13:3
45:11	14:3 15:2,25	Alto 62:24	20:4,6,16
admit 43:8	16:14,15	63:1,4,21	21:8 22:9,13
advance 40:23	17:14,16	always 30:18	23:5,14,21
adverse 23:5	18:21	33:14	25:3,12,18
36:16 38:20	23:14,18	am 5:18,20	26:3 33:2
	24:22 25:23	14:2,24 31:25	35:1 37:2
	28:20		42:5 46:18
	29:12,23		47:13 48:7,10



49:12 53:4 57:17 62:3,7 63:1,8,15 70:11 anybody 10:7,10 46:17 47:15 48:6 50:19 61:19 anymore 14:17 24:14 anyone 50:18 anything 10:9 24:13 55:19 58:7 apologize 59:17 apparent 43:11 apparently 37:20,25 41:20 43:6,7 47:6 appear 27:19 APPEARANCES 2:1 appears 10:13 27:15 applicant 28:15,19 application 25:19,24 26:4 applied 20:18,25 applying 25:19 appointed 50:5,9 appointment 27:21	approval 4:5 35:3 51:10 approved 54:11 59:1 approximately 37:16 area 20:15 37:9 areas 14:14 20:14 aren't 11:8 around 61:15 arrived 37:23 65:24 article 4:3 13:18 14:2,20 15:3 A's 40:7,19,22 41:2 ask 7:11 8:15,20 67:22 asked 18:3 44:13 50:14 60:2 67:2,9,20 asking 47:18 61:23 68:5 assessment 33:8 52:4,6 54:10 57:4,22 assessments 34:23 57:18 assist 62:7 assistance 6:16 53:8 assistant 2:8	37:10 62:23 assistants 36:22 associate 21:14 22:11 49:20 associated 40:24 assume 20:1 47:18 assumes 42:1 assure 55:18 attached 4:11,12 attempting 10:10 attorney 2:3,7,8 70:11 ATTORNEY'S 2:7 author 54:16 authorized 58:10 authorizing 13:7 available 69:3 Avenue 2:9 awarded 23:15 25:22 26:7,8 aware 9:4 23:2,5 34:14,16,20 36:5 37:25 40:6,18 49:4,21 50:22 57:17 60:11 65:9	away 8:8 17:8,10 43:2 45:3 <hr/> B <hr/> back 45:9 52:9 59:7 63:3 67:6,13 68:13 background 12:6 15:1 23:2 bad 45:12 49:12 59:19 ballpark 6:5,7 based 25:21 34:10 50:11 Basically 16:10 basis 47:25 50:21 bears 38:4 43:22,24 became 43:11 because 9:12 15:19 16:19 18:6 19:4 21:5 26:9 28:1,8 37:12 42:5 47:10,24 55:23 58:18 63:13 68:4,7 become 44:2 50:9 becomes 69:3 before 1:17 6:1 8:16 9:1 10:18 11:16 20:10,11
--	---	--	--



24:25 37:22 41:10,12 46:11 49:25 60:16 70:6 begin 8:16 beginning 64:23 behalf 1:7 2:2,5 believe 23:7 25:9,12 26:1 31:24 37:1 44:21 52:12,13 53:5 56:19 63:2 best 37:17 bet 62:24 better 9:23 10:4 17:13 50:4 55:19,20 66:22 between 57:19 big 40:11 41:13 54:12 55:12 Bill 16:8 24:3 26:25 32:17 52:18 66:10 67:24 birth 5:15 bit 42:25 blank 67:25 blood 62:18 board 23:9 44:14 boards 45:11	bodies 13:14 both 49:19 bottom 18:17 19:19 29:4 41:16 54:3 boundaries 18:25 box 28:13 Brahm 1:15 3:2 4:3,4 5:1,4,11 13:19,22,24 14:7,8 18:5,14,23 26:14 32:14 51:2 52:16 64:14,23 66:13 68:25 69:9,11 brand-new 37:8 breach 36:6 40:22 breached 10:5 breaches 51:23 breaching 9:25 37:24 43:12 47:8 50:20 break 8:22,24 9:1 24:3 56:9 bridge 55:3,5 briefly 33:25 40:1,4 bring 19:16 59:18 brought 8:8 14:5 26:12 34:15,16	Building 1:18 bullying 14:15 bunch 47:18 bur 56:9 63:11 burs 42:4 43:8 business 12:17 <hr/> C <hr/> call 13:15 26:4 30:15 45:5,12 53:2 called 5:5 20:23 26:12 calling 44:11 calls 31:13 56:2 60:8 came 8:10 13:1 18:23 19:3 20:12 35:23 36:23 37:11 61:13 63:3 can 6:4 7:8,9 8:17,20 14:24 16:17,21 17:18 24:3,4 46:23 48:2 56:4 60:4,21 63:14 67:6 68:1,14 can't 19:16 40:8 48:10 56:5 66:8 care 8:11 14:7 carries 54:5 case 1:2 25:10,14 27:11 28:1,7	47:2 49:12 53:16 61:19 66:5 68:19 cases 6:10 20:5 25:12 26:1 56:10 caught 44:19 48:13 cause 28:7 causing 6:23 center 1:18 4:3 5:22,24 9:6 13:8,15,20 14:21 15:4 59:16 central 51:10,17 52:6 53:1,3 59:1 CERT 4:8 53:2 54:3 57:19 58:9,10,16,25 certain 10:25 22:5 65:25 certainly 8:22 28:6 39:6 41:9 48:1 CERTIFICATE 70:1 certify 70:5,11 chain 34:15 39:5 44:4 45:7 chair 30:14,16 49:19 50:10,13
--	--	---	---



chaired 53:5	claiming 27:7	coming 10:18	conduct 23:20
chairs 30:18	claims 7:6,10	11:15,16	66:1
change 14:8	23:18,21,22	15:10 57:11	conducted
15:21	28:2 44:16	command 44:4	39:15
16:3,4,20	clear 17:15	45:7	conducting
18:6 37:12	47:1,4	commencing	32:8
55:6	Cleaver 43:14	1:19	conference
changes	44:16	comment 29:5	1:18 10:13
20:16,18	clinic	64:24 65:13	24:4
charge 26:11	20:7,17,19	comments 29:7	confidence
31:3	35:6,21 36:10	31:7	29:15
chart 29:14,20	39:16,19	committe 31:20	confidential
31:18	40:25 50:18	committee	24:19 26:25
charter 50:11	51:23 62:23	23:13 25:2	27:2 32:18
Chasm 5:13	65:15,25	29:21,24	52:18 56:21
Chicago 11:19	clinical 33:17	30:15 35:2	confronting
chief 4:5 12:8	47:7 53:2	49:5,7,8,9,11	14:9
13:5 15:11	58:25	,14,15,16,22	conjecture
21:8,14,20	close 16:19	50:6,9,10,20	23:7 25:9
22:11	closed 19:14	committees	28:5 39:2
25:11,13	closely 29:8	49:8,17,20	connection
28:3,4,9	31:8,12,16,23	complaints	17:6
30:17,18	45:24 49:11	34:4 45:23	conservatively
33:19,20 34:5	closer 17:7	completed 52:6	36:7
38:11 50:14	closure 19:16	compliance	considered
choosing 33:13	coaching 67:16	34:2 36:3	53:17
chronic	Coconut 2:4	complicate	construction
62:9,14	Colegally 33:1	10:12	10:14
chronically	combinations	concern 24:13	CONSUELA 1:5
61:15	49:13	59:17 61:24	consult 51:18
cited 32:4	come 12:23	63:7	contact 4:4
city 40:11,12	28:14,18 37:2	concerned 44:2	18:11 21:24
civil 1:16	39:3 45:9	45:19	22:3
18:24 20:22	53:7	concerns 27:25	contacted
claim 25:16	comes 13:6	33:18	50:14
26:6,8	16:10 28:18	condition	context 65:10
	57:8	62:9,10	continue 35:4



48:2 continues 29:23 continuing 19:12 36:6 46:24 contract 6:24 55:18 61:1 contracted 60:21 63:15,16 contributed 40:5,17 control 10:1 32:4 34:3 35:17 36:4 37:24 40:19,21,22 43:12 47:8 49:22 50:6,19,21 51:23 53:4 54:15 59:3,10 63:20,25 64:1,2,4 conversations 58:19 59:2 conveyed 34:4 Conway 2:7 3:5 16:8,15,25 17:4,7,11,13, 15,24 19:8 24:3,8,11,14, 18 26:25 27:2 31:13 32:17 40:12 41:6 42:1 46:20,25 47:17 52:17 56:2,21 60:2,8 61:20	64:17,22 66:10 67:2,6,12,24 68:6,10,16,25 69:7 coordinator 30:23 copies 4:12 cordial 22:12 core 12:17 corner 53:10 correct 19:24,25 21:3 38:21 59:21 65:4 66:7,8 70:10,13 correlation 66:9 could 5:9 7:18 29:7 41:24 42:23 45:5,20 48:24 49:1,2,3 52:9 55:10,16 56:18 59:14,24,25 60:9,20 61:4 63:17 64:5 couldn't 15:15 16:2 counsel 2:1 5:17 51:19 58:25 59:4 67:19 counseled 34:6 35:14 couple 49:8 course 18:3	court 1:1 8:17,19 24:6 70:2 CPU 33:13 create 38:16 created 38:17 credential 48:15 credentialer 30:22 credentialing 30:23 crisis 19:4,5 CROSS 3:4 crown 55:3,5 CSR 1:25 70:5,20 culture 14:8,9,22 15:7,21 16:1,3 36:19 37:5 38:1,16,17,18 65:23 current 38:9 currently 5:19 cutting 16:12 <hr/> D <hr/> database 23:17 date 5:15 28:24 51:20 53:24 54:19 57:6 Dated 70:15 dates 10:25	David 2:7 15:13 44:2,23 day 34:23 69:2 70:15 days 30:11 DDS 4:6 DEA 13:13 19:14 deadly 55:15,23 56:7 60:1 dealing 19:11,15 December 30:7 decides 23:15 decision 22:21,23 decisions 32:2 declare 70:13 deemed 29:22 54:13 deep 25:5 Defendant 1:11 DEFENDANTS 2:5 defined 68:19 defining 68:21 definitely 55:20 definition 66:24 67:21 definitively 64:5 66:8 degenerate 67:17
--	--	---	--



degree 11:12	deputy 53:8	DIRECT 3:3 5:7	20:25
delivered 8:11	described 14:8	directed	doctor 67:22
delivering	DESCRIPTION	20:7,17	document 13:7
59:19	4:2	direction	27:2,24 32:22
denotes 35:6	desk 47:7	37:18 45:23	39:25 46:6
dental	despite 40:21	directly 6:22	47:20
20:7,17,19	detail 9:9	21:11 22:17	52:18,25
21:9 33:2	54:12	director 5:24	53:21 54:3
34:5 35:6	details 56:8,9	7:23,24	documentation
36:10,22	determined	12:13,14,19,2	32:3,6
37:10	41:21 54:4	1 28:10,25	documents
39:16,19,20,2	didn't 22:10	38:9,11 44:7	10:18
1 40:24	36:19 43:2	49:20 59:16	doesn't
48:17,18	44:9,24 45:5	director's	16:6,13 36:11
50:14,18	51:12 54:8	13:6	54:25 56:9
51:23 63:11	58:12,16	disconnect-	done 7:14,15
65:15,25	60:21 61:9	reconnect	8:13 12:20
dentist	65:25 66:20	16:10	13:5 29:19,20
9:13,15,17,21	67:22	discuss 41:11	54:11,15,17
,22 35:4	68:2,4,7,8,9,	discussing	57:23,24
40:6,19,22	20	17:19	63:14,16
41:1,3,4 52:3	died 6:21	discussion	64:13
53:15,18	27:15	13:21 15:23	don't 6:6 7:11
59:11 61:2,13	difference	53:15 56:20	8:16 9:20
63:11 64:25	55:12	57:23 64:21	10:3,6,8,17
66:16 68:19	differences	disease 53:6	16:9 17:2,9
dentists 28:2	20:25	64:2,5	22:15 23:7,10
Department 2:6	different	diseases 61:15	24:10,12,19
50:24	13:13 25:3	63:15	25:9 26:9
depending 25:4	49:16 55:2	distress	28:21 29:11
depends 48:19	56:13	56:1,11	30:9,10 31:14
deponent 70:9	differently	distressed	35:10,12,14
deposition	62:14	56:6	39:4,17,24
1:15 5:1,25	difficult	DISTRICT 1:1	42:15 43:6,7
8:7,14 10:13	19:17	2:8 70:2,3	44:13
64:23 69:10	diligence	dive 25:6	48:16,21
depositions	28:21	diversity	49:15 50:1
7:1,13,20			54:19 60:18
			62:12,20 63:5
			65:6,8,18



66:4,6 67:17 68:13 door 10:14 37:7 doses 49:13 down 8:17 19:19 27:20 29:4 33:9 53:17 54:2 DOWNS 2:3 Dr 7:19,25 11:2,21,25 13:1 15:13 21:18,22,25 22:4,14,17 23:2 27:20,25 29:25 30:14,16,17,2 0,21 31:4,8,11,12 32:7,25 33:10,17,21 34:1,9,10 35:1,16 36:3 37:24 39:4,7,9,14,1 5,20 41:21,24 43:11 45:8,15 46:1,7,18 47:6 49:4 50:16,20 57:14 60:13 65:1,14,19,20 draft 32:10 51:8,9 drafted 53:11 54:14 58:19 drawn 62:18 drilling 15:1	Drive 5:13 dropped 23:23,24 24:16 drops 45:17 duly 5:5 during 14:6 18:2 33:11,14,17 47:7 48:23 65:19 <hr/> E <hr/> each 8:16 50:10 earlier 41:25 56:19 early 45:16 easier 41:8 East 1:18 education 11:11 elect 69:1,4 elected 67:21 else 24:20 42:11 51:15 58:7 emotional 56:1,11 employed 5:19,21 employee 12:2,4 22:21,22 37:14 70:11 employees 14:23 15:8	19:23 34:12,21 36:15 37:19,25 38:13 45:24 65:25 66:5 end 51:13 ended 61:3 enough 44:9,10,15 45:11,20,21 68:23 ensure 29:22 entering 67:16 entitled 13:18 environment 14:18 environments 19:21 episode 53:2 equipment 42:5,6,11 especially 28:3 established 59:10 event 23:6,8 38:20 57:18 events 8:4 23:5 every 29:19 53:16 64:9,11 Everybody 17:23 everyone 21:1 everything	8:17 11:7 45:25 54:13 Everything's 67:17 evidence 34:5 35:12,13 44:9,15 45:20,21 47:21 52:9 exactly 12:19 43:7 examination 3:1,4,6 5:7 48:2 66:11 70:8 examined 5:6 EXAMINATION 3:3 example 19:14 excuse 40:7 executive 23:9,13 25:1 29:24 30:15 31:20 32:1 35:2 exhibit 13:17,22 18:10,14 26:14,18,21 32:14 51:1,2 52:16 56:25 exhibits 4:1,2,11,12 exist 38:2 exonerate 61:18 experience 12:12
---	---	---	--



expert 25:25 53:6 64:1	factor 9:9 25:24	38:5,7,10 45:5	firsthand 65:18 66:6
experts 52:7 53:5,6 54:4,11,22 59:2,3 62:24 63:20,21,22,2 4 64:2,5	factors 40:5,17,20 53:17 62:15	feeling 21:4 45:22	five 28:25
explanation 27:16 28:11,13	facts 42:1 47:18 48:4 56:12,13	felt 23:9 37:20 50:13	fix 14:5
exposed 9:11,12 55:22 56:7 60:1 61:18	factual 61:2	few 56:10 64:17	FL 2:4
exposure 9:16 61:8	factually 61:4	field 13:12	flip 33:23
extended 30:3,12 32:3	failed 67:11	file 25:16	focused 29:11,12 44:25
extent 24:18 25:21	failure 33:11 35:6,8 40:20	filed 9:5	follow 29:17 66:17,21 68:21
extra 62:18	fair 65:11,20 68:23	files 30:24	followed 33:12 52:3 59:11 60:25
extremely 55:10	familiar 14:1,2 18:19 32:23 41:19 51:6,7 52:23 57:1,2 63:7 64:8	fill 48:10,12	following 68:19
<hr/>	familiarize 41:18	filled 46:18 47:13 48:7	follows 5:6 29:16
<hr/>	family 59:18	final 22:21,22 58:20 61:25	followup 55:9
<hr/>	far 17:10	financially 70:11	foregoing 70:6,10,13
face 53:22	farther 17:8	find 42:23 56:18	forget 7:18 48:4
facilities 53:9	fast 14:24,25 40:9,11	finder 33:5	formal 57:22
facility 12:13 18:4 21:5 38:2,6 40:6,18 47:6	fault 23:10	finding 25:1,2 32:8 42:22	former 38:13
fact 19:5 25:1,2 32:8 33:5 36:18 55:17 57:8 61:19	fear 21:2 36:20 37:3,12 38:2,17 55:11,16,21	findings 39:21	formulate 58:5
	February 30:8	fine 8:22 41:9 48:1,4	forth 68:14 70:6
	Federal 1:16	finish 8:15	forward 36:23 37:11 39:3 45:13
	feel 9:12 25:5	fired 43:10	found 17:21 34:11,21 42:4
		first 5:5 7:10 12:23 19:17 51:22 59:13 67:5 68:3	foundation 6:17,23 19:8



four 12:18	21:22,25	going 10:15	49:10
FPPE	30:17	11:23 12:5	gut 45:12
29:8,9,11,12,	general 51:19	13:11,17 17:6	guy 22:25
17,22,25	58:24 59:4	18:5 31:7	guys 54:7
30:11 31:8,15	generally 50:8	40:4 41:22	
32:2,5	66:19	42:25 44:9	
FPPEs 34:25	genomic 55:18	46:20,21,25	<hr/> H <hr/>
FRED 1:5	60:19,23,24	51:11 62:16	habits 33:11
free 55:17,23	61:4,7,17	gone 24:15	had 5:25 7:17
frequent 22:6	62:2,6,19	35:17	12:17 13:14
frightened	63:13	good 9:2,3	15:21 19:23
59:23 60:7	get 16:17 25:5	13:10 17:11	21:10 26:10
frightening	29:12,13 39:6	33:7	27:23,24
59:24,25	43:2 44:19,23	gotcha 57:16	29:25
from 11:13	45:2,20 50:9	go-to 33:2	30:8,10,11
12:14,16	51:10 64:8	gotten 56:14	31:15,17,19
15:10 18:4	gets 22:21	gown 42:21	34:1 36:2
21:15 28:18	getting 24:18	gowns 33:15	39:3 41:23
29:17 35:21	57:13 62:17	grab 50:23	45:12 49:25
37:15 40:4,10	give 6:4 53:8	54:20	51:10 52:4
45:15,23	61:24 62:8	graduated	54:7,9,10
50:13,18,19	64:12 68:14	12:14	55:3,4 56:11
51:10 53:1,3	given 53:19	graduation	60:20
57:4 58:9	58:10	12:16	63:8,10,17
59:1	giving 39:25	greater 23:18	Hader 1:17,25
61:2,9,13,18	67:24	26:1	70:5,20
62:18,24 63:3	glove 33:12	grounds 46:21	hadn't 16:23
68:12	gloves 33:13	group 2:3	halls 19:2
FUENTES 1:6	43:1	30:19 45:13	hand 34:3 36:4
full 25:23	go 18:16 19:9	51:9 53:1,5	49:24
30:23 52:5	24:22 25:6	62:24	hands 33:11
further 37:3	29:21	Grove 2:4	handwashing
53:16 64:15	39:10,21 40:1	guess 8:9 25:5	33:11
68:24 70:11	42:2 47:21	27:8 34:14	happen 42:23
	48:18 58:11	42:24 46:16	happened 9:8
<hr/> G <hr/>	61:3 62:15	guidance 53:9	10:25 25:11
Gavin 53:7	goes 40:23	guidelines	44:22 52:2
Gelman	41:17		happens 16:5



happy 8:24	16,17 57:22	hear 7:8,9	58:4
hard 19:16	58:5 60:1	10:15 14:24	higher 39:3,7
harm 6:19 17:3	61:9,12 63:9	46:14	highest 11:11
has 9:4 17:5	64:8,17,20	67:5,8,12,18,20	highly 38:11
19:1,5 24:4	65:24 66:6	68:10,11,12	him
28:14 30:25	68:1 69:4	heard 26:22	22:9,10,18,24
38:14 39:13	having 5:5	49:25	29:1 31:16
46:17 47:9	16:8 27:23	hearing 50:1	32:11 33:1,4
50:10 52:6	55:14 61:3,18	hearings 13:12	42:15,16,20,21,22 43:2
67:9,19 68:11	he 9:25	held 19:1	45:17 50:5
have 5:25	10:4,5,6,10	he'll 44:19	67:6
6:2,12 7:12	12:1	helping 24:9	himself 46:18
10:18	21:11,13,14	helps 37:6	48:7,10,13
11:4,7,15,17	22:10,11,13,15,16,18,22	hepatitis	hire 22:22,24
12:12,17,20	23:4,6,9	60:13	23:14
13:3,7 17:16	27:7,8,9,16	her 14:6	hired 23:3
18:24 20:4	28:8	37:1,11 44:18	hiring 13:3
21:8,24	30:2,5,8,9,10,11	47:18,20,23,25	22:14
22:1,9,15,16,17,18 23:10	31:15,16,23,24	5 48:3 61:20	27:24,25
25:17	4 32:10	68:4	his 8:8 13:3,7
26:10,11	33:2,7	here 5:17 8:9	27:16,24 28:8
27:24 28:1,2	34:6,10,12	10:19 14:4,17	31:17 32:2
30:5,6,8,22	35:10,13,19,21,22,23 36:6	24:7 28:5	33:8 34:23,25
31:16,17	43:7,8,11	35:13 38:7	39:22
33:10	44:9	39:20 45:12	41:21,22,23
34:10,15,22,25	45:2,18,19	47:24	42:4,10 43:8
35:1,7,10,17	47:12	54:12,16,20,21 61:5	45:9 47:7,9
37:6,8 38:25	48:7,10,12,14,16,19,20	herein 5:5	48:16,22
39:4,7,10,12,20 40:2 41:24	49:14,15,16,21,24 50:3,5	he's	63:11
42:4,12,13,16	67:22 68:20	24:12,14,16	history 19:20
43:10 44:9	70:8	27:6 31:7	23:14
45:10 47:14	head 8:19	33:6,7	HIV 60:14
48:2,9,11,12,13,14,17 49:8	heal 4:3 13:19	Hickory 5:13	hospital 7:23
50:3 52:17	19:16	high 49:13	15:15 16:2
53:6 54:4	healthcare	53:16,17,19	37:16,17
55:22	12:15 41:13	54:8 56:11	49:10 59:3
56:6,7,11,14,			hostile 19:20



hotspot's 16:25	37:21 40:4,8,10	including 37:21 47:11	inspection 39:20 40:2
Houlihan 7:19,25 15:13 44:23 45:15	41:19 43:1,16 44:11 46:6,16,20,21 ,25	53:7 INDEX 3:1 4:1	41:14 42:5 inspections
Houlihan's 44:2	48:3,13,21 50:22 51:7,19	indicate 35:1	13:13 39:16,22
hour 14:6	53:14 55:24	indicated 19:3 47:24	40:25 41:22,23
hours 33:17 47:7 48:24	57:2,13,15 61:23	individual 65:3	42:17 instance 50:12
human 22:1	62:12,17 63:6	individually 1:6	57:8 instances
hurt 10:1,6,10	64:8 66:23	infec 40:7	26:24 Instead 39:25
hygiene 49:25	67:1,4 68:5 immediately 52:2,3	infected 55:14 64:6,7	instinct 45:12 institute
<hr/> I <hr/>	implemented 20:17,23	infection 10:1 32:4 34:2	12:15 instituted
I'd 64:8 67:18,20 68:11	important 61:14	35:17 36:4 37:24	45:14 instruct 47:25
idea 17:17	improper 35:16 40:7,19	40:19,21,22 43:12 47:8	instructed 47:23
identification 13:22 18:14 26:14 32:14 51:2 52:16	improvements 14:7	49:21 50:6,19,20	integrity 33:6 39:13
identified 20:14 40:5,17	inadequate 65:15	51:22 52:12 53:4 54:15	intent 66:15
IG 10:22 13:13 45:24	incidences 26:23	59:3,10 63:20,25	interaction 21:8,10
I'll 6:7 8:24 12:6 26:24 33:24,25 40:1 48:2 54:20	incident 6:21 8:8 20:9 31:22 38:4 39:1 41:21	64:1,2 infectious 53:5 64:4	interested 70:12
I'm 7:14 10:16 11:20,22 14:3,4 17:20 18:20,21 19:5 20:10 21:4 25:5,25 28:12,23 30:6	46:11,13,14 53:4 62:1 incidentally 12:25	information 19:15 21:24 28:6 54:7,9,22 57:8,11,21 58:4,13	interrupted 12:5 interview 14:6 18:3 25:6 26:12
	incidents 36:16	informed 58:20	interviewed 18:9
	included 40:20	inquiry 42:23	intimidation



14:15,22 15:7 16:1 21:2 36:21 38:18 into 11:10 24:19 26:12 46:17 62:15 investigated 36:23 47:15,16 48:6 investigating 41:20 investigation 10:9 11:1 23:20,25 52:5 investigations 8:3 19:12,13 47:4 investigative 14:21 15:6 44:14 investigator 28:14 33:4 investigators 11:6 involved 7:2 8:6 64:3 involving 7:5,6 8:1,5,6 Iron 12:21 issue 25:4 28:5 34:22 36:19 37:4,5 46:4 47:5 66:5 issued 57:19 issues 6:23,25 7:15 26:10,13 32:3,4 33:2	35:1 40:24 its 53:22 it's 13:18 14:25 16:12,18 17:3,9 18:5,11,17 19:16 23:17,24 29:1 32:13 36:20 37:5 41:12 42:3,8,9,13 47:4,14,24 52:8 55:19,20 56:13 I've 7:14,15 11:17 26:9 34:20 64:15 66:10,13 <hr/> J <hr/> jackhammer 10:15 16:11 jackhammering 16:17 January 14:20 15:4 30:8 35:19,23 43:9 Jason 24:5,6 45:3 Jay 8:6 job 25:20 jobs 11:15 joined 24:4 Joy 21:18 JR 2:3 July 5:16 just	8:15,23,24 13:24,25 14:3 18:17 24:18 25:7 31:22 33:2,24,25 34:16 41:17 45:21 47:12 48:6 51:4 58:8 60:16 61:5 62:8 64:12,18 66:18 67:15 68:12 JUSTICE 2:6 <hr/> K <hr/> keep 17:6 33:13 54:21 58:12,16 keeps 30:24 kept 11:4 57:11 key 25:24 54:16,22 61:5,11 kill 44:10 killers 46:9 kind 16:4,12 20:1 23:16 24:1 25:2 28:9 44:22 45:22 68:13 kinds 30:24 knew 9:23 10:4 36:18 39:9 43:4 54:23 56:8 59:19,23 66:16,21 68:20	know 6:18 7:15 8:11,21,23 9:8,9 10:17 11:23 13:4 14:1,16 16:9 17:2,9,18,20 18:18 19:11 22:10,13,15 23:4,10,23 24:10 25:8,11 26:5 28:21 29:11,25 30:9,10,11,13 ,20 31:14,15,22 32:23,25 33:2 34:20 35:10,12,14,1 6 37:9,13,16 39:4,14,15,17 ,19,22,24 42:15 43:6,7 45:18,19,25 46:1,21 47:12,15 48:6,16,21 49:15,18 50:3,5,18 51:5 52:8,22 54:19 56:9,13,25 60:16,18 61:6,11 62:12,13,20,2 1,25 63:5,12 65:18 66:4,15 knowing 31:22 52:2 56:12 knowledge 7:3 10:11 55:8 66:6 known 34:2
--	--	--	---



36:3 50:3 54:23 60:13 knows 19:6 <hr/> L <hr/>	learn 51:22 59:25 learning 56:6 least 37:2 39:18 left 19:5 53:10 legal 65:10 legally 65:3 less 26:7 37:13 lets 50:3 let's 6:12 22:24, 25 33:23 35:22 50:25 68:12 letter 4:7 32:15 50:24 51:5, 7, 8, 10, 2 0 52:1 53:24 54:23, 25 55:6, 13 57:25 58:20, 24 59:7, 9 60:11 letters 55:2 58:11 level 11:11 23:16 31:15 39:6 45:10 levels 48:11 liability 61:8 license 46:8 47:9 light 20:12 48:4 57:8, 11 limelight 45:18	limit 61:7 line 24:20 lines 10:24 11:3 64:24 65:16 listen 12:6 listening 20:24 24:13 litigation 8:5 lived 12:2 local 54:10 long 14:6 18:6 19:24 35:16 43:4, 6, 7 63:17 longer 38:7 look 13:16, 24 18:4 23:21 24:25 25:7, 10, 11 26:3, 10, 15, 20 29:4 39:3, 7 42:6 45:8 52:7 56:24 57:13 59:7 64:13, 18 looked 11:10 26:12 28:1 31:24 46:17 looking 14:3 18:21, 22 27:19 29:14 39:18 42:14 43:16 46:6 53:14 looks 24:14 27:6, 11 28:4, 6, 8, 17, 1	8 49:12 52:17 53:4, 11 Lori 43:14 44:16 lose 25:16 lost 7:8 47:9 lot 7:14, 15 20:22 21:5 39:13 49:1, 3 62:15 lots 20:19 57:22 loud 8:18 17:15 loved 60:6 low 9:16 52:8, 10, 11, 12 54:5, 10, 13, 24 , 25 55:4, 5, 7, 13, 1 4 56:11 57:25 58:3, 6, 15, 20, 21 <hr/> M <hr/>
			made 26:11 32:2 55:12 64:24 65:13 70:8 Madison 2:9 21:16 majority 34:1 36:2, 5 make 16:20 22:21 52:7 60:25 maker 22:23 making 66:23



malicious 10:3	54:4 62:5	meant 19:10 66:15	MIAMI-DADE 2:3
management 12:8	may 22:1 23:10 26:10	mechanisms 44:25	Michigan 12:22
mandatorily 26:2	42:11,13 45:19 53:18 55:22 56:7 57:21 59:18,25 64:20 65:24	media 47:5	middle 18:22 37:18 53:14
many 6:3,4 28:1 32:1 48:11 52:2 54:21 60:18	maybe 6:6 47:14 58:13,16,18 65:14	medical 1:18 4:3 5:22,24 9:6 13:8,15,20 23:8,13 25:1,12,13 29:24 30:15 31:18,20 35:2 59:16	might 6:18 22:8 64:17
Marcantonio 22:4 27:20 31:11 33:21 34:9 35:1 39:4,5 50:16 65:14,19	me 6:24 7:8,11 8:9,23,25 12:6 14:1,24 16:3,4 17:14,18 18:18 21:3 22:12 29:2 32:22 34:14 35:5,9 39:21 40:7 46:12,14,24 50:3 51:5 52:22 56:25 57:13 58:10 59:15,16 64:5,12,13 68:14 70:6,7,9	medication 8:2 48:25	military 23:4
Mareno 24:5,6		medications 47:11 48:18	Milwaukee 12:1,3,10
mark 13:17 18:10 24:23 26:17 50:25 52:15		medicine 22:11 30:25 31:4 46:10 47:11,12	mind 17:20 54:21 62:8
marked 13:22 18:14 26:14,21 32:14 41:12 51:2 52:16 56:24		meetings 22:5 54:21	mine 17:9
Martin 62:22,25		Melissa 54:16,17 57:4 63:5,22,24	minute 64:12,18 67:15,16
Mary 1:17,25 2:4 13:18 17:18 18:11 24:22 26:17 32:13 41:12 50:23 52:15 56:18 70:5,20	mean 7:4 9:11,24 19:7 24:12 25:4,15 37:15 58:9 62:15	member 50:9,15	minutes 58:13,17
massive 20:20	meaning 65:7,9	members 50:12	mischaracteriz es 61:20
Master's 11:12	means 12:18 29:13 66:14,18,20	memory 10:22,25	moment 13:25 18:18 32:22 51:4 52:22
matter 53:18		mentioned 34:1 36:3 65:22	money 25:22
		mentioning 7:25	monitor 29:8 31:8
		met 39:21	monitored 29:14,23 31:11,16,23,2 4 34:6 35:14
		Miami 24:7	monitoring 34:9
			monitors 30:24
			month 12:25 30:7 51:25
			Monthly 22:7,8
			months 29:19



30:6 35:25 36:7 Moore 54:16 57:4 63:6,22,24 Moore's 54:17 more 7:22 12:6 28:6 35:7 36:7 47:1 51:25 54:22 56:8 57:8,10 58:13,18 64:20 Mountain 12:22 move 6:24 45:7,13 68:3 moving 6:17,19 MSEC 30:14,15 31:25 much 15:10 17:13 55:11 57:21 multi 62:16 multiple 6:23 8:3 13:13 18:25 19:20 45:1,23 47:4,11 Murawsky 45:8 MURPHY 1:5 my 7:3 8:15,18 10:11,22,24,2 5 20:14 31:15 39:6 42:13 45:7,12 48:2 55:8,21 58:8 61:24 62:1,17 63:7 64:13,18	66:15 68:16,18 70:10 myself 37:7 51:12 <hr/> N <hr/> N69 5:13 nagging 42:25 name 3:2 5:9 named 24:4 28:8 narcotics 45:16 48:9 necessarily 14:17 necessary 17:1 necessity 14:9 need 8:22 33:24 41:18 64:18 needed 50:13 69:3 needs 57:7 negligence 6:11 7:2,3 65:10 67:21 68:18,22 negligent 9:13,15,17,18 64:25 65:6 66:14,18,20,2 4 67:22 network 44:7 never 17:20 19:5 new 19:1 23:14	29:13 45:14 60:22 62:9,13 newer 54:9 news 59:19 next 10:14 18:10 33:23 50:25 nice 67:18 nine 35:25 36:7 no 1:2 7:3,7,10 9:20 10:11 11:24 13:4 17:16 21:12,20 22:25 32:4 33:24 34:14,18 38:7 39:11 42:19 46:2,5 50:7 55:4,16,24 57:9,10 60:15,21,24 62:4,8 63:10 64:15 65:5,8 67:8 68:8,24 nodding 8:19 nor 70:11 normal 20:13 not 7:3,23 8:11,12,20 9:9 10:11,16 12:14,19 14:16,17 16:4 17:9 18:5 19:14 20:13 22:6 23:9,23 24:14 25:25 26:13 27:13	28:12,23 30:6 31:25 33:12,14 34:13,14,15,2 1 35:1,4 37:19 38:10 39:6 40:6,18 41:23 42:16 43:1,7 44:15 45:9 46:21 47:23,24,25 48:3,7,19,21 50:22 53:18 54:12 55:18 56:12,17 57:21 58:18 59:10 61:1,11,12,13 ,14 62:12 63:6 64:8 65:3,9 66:17,23 67:4 68:19 70:11 Notary 1:17 note 57:7 61:14 noted 47:4 48:11 67:10 notes 10:24 11:3,4,8 64:13,19 70:10 nothing 44:24 55:19,20 notification 40:24 59:18 November 4:7 30:7 51:21 52:13 53:12 54:7 57:19
---	--	--	---



now 18:4 31:23 33:20 46:1 47:9,23 53:10,24 54:2 56:12 65:3,18 67:16 number 33:9 45:10 53:16 nurse 12:11 48:23 56:8 63:25 nursing 12:8 <hr/> O <hr/> oath 70:7 object 46:20,23 48:1 objected 67:19 objecting 47:1 objection 19:8 31:13 42:1 47:17 56:2 60:2,8 61:20 67:2,9 68:16 objections 70:8 objective 62:1 obligation 30:25 38:16 O'Brien 4:6 11:2,21,25 32:7,25 34:11 39:15,20 41:21 57:14 O'Brien's 39:14 observation 31:18	occur 38:10 54:21 occurred 39:4 61:25 occurring 34:24 45:25 Oct 35:22 October 12:24 19:4 30:7 35:21,22,24 51:24 54:18 70:15 off 6:17,19,24 13:4,21 15:23 24:16 56:20 64:21 offered 55:8,17,23 offhand 48:16 54:19 office 2:3,7 11:19 13:6 14:7 19:6 51:10,17 52:6 53:1,3 58:24 59:1,4 officer 12:8,9 25:12,13 51:16 official 22:18,19 often 28:2 39:17 42:15 OGC 58:9,22,23 oh 6:4 27:4 29:11 34:19 57:13,14,16 OIG 18:9 40:2	41:20 okay 6:8,15 7:4,11 8:14 9:10,14 13:8 14:13 16:15 17:4,7,11 18:2,8,16,20, 21 24:8,11,17,21 26:15,22,23 27:4,12,14,19 29:4 30:3,5 31:3,5 32:13,16,19,2 4 36:2,12 38:23 39:12 40:4,10 41:5,19 42:10 44:22 46:17,23 47:22 52:21,24 53:14,24 54:2 57:2,3,6,14,1 7 60:6 64:10,12 65:13 66:13,18 68:3,25 old 57:13 on 1:7,19 2:2,5 7:12,15 9:21 10:5,16,25 15:14 16:19 17:22 18:24 21:5 22:25 23:22 24:20 25:12,18,19,2 2 26:2 30:24 31:25 32:5 33:9,13 34:10	35:18 40:23 41:13,16 42:21,25 43:1 46:20,22 48:3,19 49:4,14,15,16 ,21 50:5,11,21,25 51:10,15,20 53:10,22 54:2,7,17 57:6,15 58:2,3,12 62:16 63:6 69:1,5 once 39:21 43:11 69:2 one 6:14,25 7:10,17 12:18 14:16 20:13,20 23:6,8 26:17,22 27:6,10,11 28:8 30:8 36:22 37:10 41:12 48:12 49:8 52:11 53:7 55:2,4,6,7 56:19 57:7 59:8 60:21 62:22 63:16,22,24 64:1,12 67:5 ones 7:16 60:7 ongoing 29:18 50:21 59:2 online 25:7 only 8:21 27:11 50:3
--	---	--	---



55:6	ourselves 37:9	47:11 48:25	56:5,12 61:15
open 37:6,8	ousted 44:23	49:5,7,9,10,15 50:6	63:7
opinion 22:9	out 8:18 15:8	Palo 62:24	perfect 18:5
58:5,8	16:12 22:2	63:1,4,21	perhaps 39:3
opioid 7:19	25:6,17 34:21	paragraph	period 37:22
13:11 46:3	37:16	59:14	43:4 69:2
47:5 48:12	42:22,23	paraphrasing	perjury 70:13
49:11,16	47:18 51:11	14:4	permission
opioids 8:2	52:1 53:25	Pardon 63:23	48:14
49:12	58:11 59:8	part 31:25	permitting
OPPE	60:11 62:17	34:25 35:2,3	38:1
29:8,9,18,23	over 7:16	42:5 51:12	person 8:12
30:5,11,20	8:1,16	61:7,17	22:16,20
31:8	11:5,8,17	particular	62:16 64:11
OPPEs 31:2	13:9 19:24	66:4	personal
opposed 8:19	25:12,15,17	parties 70:11	11:4,8 42:10
38:18	29:15 33:23	pass 22:25	personally
order 32:2	39:21 41:17	passed 45:3	42:4,6
48:20	47:8 59:13	passing 8:8	pervasive
orient 13:25	overnight 16:5	patient 27:15	14:22 15:7,25
18:18 32:22	overprescripti	61:1	21:3,4
51:4 52:22	on 8:2 46:3	patients 33:15	phone 16:18
original 4:11	overseeing	53:16 55:3,4	phones 16:19
other	49:24	60:12 61:3	physician
7:1,13,20	oversight	pay 25:17	62:12,23
8:17 13:4	29:18 48:9,11	peace 62:8	physicians
26:4 28:8	49:9	peek 41:10	23:23 64:2
40:24 44:25	owned 42:4,6	peer 29:20,21	Pica 21:18
58:4 61:10	<hr/>	31:19 44:25	30:14,16,20
62:16	<hr/>	45:8,9	31:4 39:7,9
others 20:19	p.m 1:19	peers 29:20	place 14:5
our 10:5 30:22	page 3:2 4:2	penalty 70:13	19:4 27:7
33:2 37:14	18:16,22	pending 8:25	37:8,17 38:2
45:21 48:9,12	19:19 32:21	people 39:3	41:22 70:6
49:19 51:16	33:23,24	54:15 55:25	Plaintiffs 1:8
53:5 54:15	41:16,17		2:2
66:16	52:21 56:25		
	57:15 59:13		
	pain 8:2 46:9		



played 22:13	35:17	35:10	19:15
please 5:9,15 8:15,18 26:21 42:25 43:1 51:1 52:21,23 56:25 67:7	40:20,23 59:10 precautions 34:3 36:5 preexisting 60:18,19,20 prescription 8:1 prescriptions 46:18 47:13 48:7,15 present 55:24 68:20 press 44:11 45:6 pretty 47:3 prevent 45:15 prevented 38:25 39:12 previous 14:15 15:10 67:12 prior 8:9 11:18,20 12:9,12 23:3 27:24 privilege 48:21 privileges 23:15,16 48:16,17,22 privileging 30:23 probably 10:14 29:1 36:7 56:11 67:3 problem 16:9	problematic 11:23 procedure 1:16 33:14 54:4 procedures 33:12 48:19 53:17 66:21 proceedings 70:6 process 35:3 Professional 1:17 70:5 program 20:23 proper 33:14 47:24 property 6:17,19,25 propounded 70:8 protective 42:11 protocol 33:12 34:4 36:6 52:3 protocols 49:9 provide 68:13 provided 28:15 65:14,19 provider 23:15 25:4 26:10 29:18 providers 29:12,13 provides 28:11 providing	psych 18:24 psychological 14:18 20:21 21:6 37:6 public 1:17 15:20 51:11,16 pull 15:19 pulled 53:3 punished 43:17 purpose 10:16 purposeful 9:22,24,25 purposefully 9:25 10:4 purposely 10:1 66:16 push 14:7 put 16:21 42:21 43:1 45:17 70:7 putting 47:17 <hr/> Q <hr/> quadrad 12:18,20 quality 12:8 37:17 question 8:15,21,25 9:1 15:18 47:19 48:21 56:4 66:13 67:25 questions 8:7,10,18
poets 14:11			
point 32:7 42:14 44:1,8 58:19 67:25			
pointed 14:7			
policies 10:5 45:14 49:10 66:16 68:20			
policy 37:7 68:21			
poor 33:10			
position 5:23			
positions 12:10			
positive 28:23 60:13 64:6			
positives 63:8,9,10			
possession 46:9			
possible 42:3,8,9 55:11			
potential 9:12 26:7			
PPE 33:14			
practice 29:16,22 45:19 61:13 63:11			
practices			



64:15,17,20 68:24 70:7 quick 24:3 quickly 7:11 64:19 quite 42:25 44:13	s 58:9,10 recommended 27:20 50:12 record 5:10 8:20 13:21 15:23 17:23 27:3 56:20 64:21 67:10,19 69:1,5 recorded 70:8 REDIRECT 3:6 reduced 57:18 reference 19:20 references 26:4,13 referencing 15:9 37:22 referred 41:4 56:19 referring 64:25 refills 45:16 reflect 53:21 refresh 10:22,25 regarding 8:10 region 12:19 33:3 regional 11:19 Registered 1:17 70:5 related 7:21 10:24 32:3 relation 6:20	43:19 relative 7:13 70:11 released 29:17 relevance 46:20 remedy 8:13 remember 7:14 30:10 44:13 50:1 66:2 remind 42:20,21 reminded 42:15,21 removed 23:11 35:21,23 37:7 45:2 52:4 removing 20:5,6,8 report 4:4,6,8 10:23 14:20 15:4 18:11 21:11,13,19,2 0 22:21 31:17 32:10 34:18 36:16 38:20 40:2,22 41:4 43:2,24 54:17,19 57:3,20 65:25 reported 1:24 21:14 22:17 25:18 26:2 31:20 33:10,18 39:5 reporter 1:17 8:17,20 14:25 15:3 16:18,23 17:2,5,9	18:12 24:7 26:18 32:15 40:8,14 41:1,5 70:1,5 reporting 14:21 15:6 20:21 35:3 reports 33:16 representative 50:13 represented 5:17 reprisal 36:20 37:3 requested 70:10 require 45:17 required 25:19 26:2 39:17 reread 11:1 research 23:22 28:22 residency 28:9,25 resident 28:3,9 residents 28:25 resource 22:1 respect 18:24 20:22 respected 22:10 respectful 22:12 response
---	---	--	--



6:20,22 32:10 53:2 responsibility 38:4 43:22,24 responsible 27:16 result 63:10 results 37:15 63:1,3 retaliation 14:22 15:8 16:1 retired 21:23 retrained 20:4 retraining 20:5,6,8 revealed 14:21 15:6,7 review 10:21 23:17 25:21,23 29:12,14,20,2 1 30:1,5 31:17 69:2,4 70:9 reviewed 10:18 23:9,12 51:17,19 53:15 reviews 23:14 25:14 29:21 31:19 44:25 45:9 revise 69:3 rewarded 37:11 RICHARD 1:5 Rieder 2:3	3:3,6 5:8 13:16,23 15:2,5,24 16:14 17:12,14,16 18:1,8,13,15 19:18 24:6,9,12,16, 21,24 26:15,19 27:1,4,5 31:21 32:13,16,19,2 0 40:10,13,15,1 6 41:3,9,15 42:7 46:23 47:3,22 48:5 50:23 51:3 52:15,20 56:3,18,22,23 60:3,10 61:22 64:12,20 66:12 67:4,8,15 68:2,8,11,17, 23 69:8 right 8:14 9:4 10:12 11:3,15 13:1,2,16 14:3,4 15:2,10,25 16:14,15 17:14,16 18:21 19:19,21 24:21,22 28:20 30:22 33:9,21,22 35:8,13 37:18,21 38:8,10,15 40:15 43:3	44:16 50:17,23 51:4 52:25 53:12 54:5,6 59:5,7 61:5,24 62:6 64:14 66:21 68:23 69:8 risk 9:16 52:4,5,6,8,10 ,11,12 53:16,18,19 54:5,8,10,13 55:4,5,14 56:10 57:4,17,22,23 ,24,25 58:1,3,4,6,15 ,21 RISTOW 1:6 RIVERS 1:5 ROBERT 1:5 ROGER 1:6 role 12:21 13:3 22:13 27:9 28:3,4 room 1:18 10:14 roughly 35:23 36:1 rounds 22:6 RPR 1:25 70:20 ruled 48:3 rules 1:16 68:13,25 <hr/> S <hr/> safe 29:16 37:20	safety 14:18 20:21 21:6 37:6 40:21 49:11 said 11:24 18:5 33:9 35:19 44:19 55:7,13 58:22 68:9 salary 13:5,7 SALVADOR 1:6 same 7:16 12:25 16:8 55:9 67:25 Sara 44:18,19 say 8:18 9:17,24 15:14 22:24 25:19 26:6,24 36:7 38:19 39:2 44:8,9,11,12, 21 52:8 54:25 55:21 60:20,21 61:1,4 65:11,20 66:8,15 67:9,22 68:8,12 saying 31:7 41:1 44:13 52:9,10 58:16 65:1,16 says 14:4,8,20 15:3 18:23 24:10 27:12,13 28:23 34:1 35:12,13 36:2 40:5 41:13
--	--	---	---



50:24 52:11 53:15,17 54:3 59:9 scandal 7:19,25 13:12 14:6 15:19 scandal- plagued 4:3 13:19 scared 15:17 Schiller 13:1 22:14,17 27:25 29:25 30:21 31:8,12 33:10,17 34:10 37:24 43:11 46:1,18 47:6 49:4 50:20 60:13 65:1 Schiller's 23:2 27:20 34:2 35:16 36:3 41:24 46:8 65:20 scope 62:17 scrutiny 26:7 seal 41:13 second 37:10 59:8,13 67:5 secretary's 53:8 section 29:5 see 6:12 7:14 16:16 23:22 24:4 27:10,17 29:5 35:22 38:19 41:6	53:10,11,19 56:8 seeing 33:15 seem 31:23 34:8 seemed 22:11 32:2 seen 26:9 27:23 40:2 42:12,16 selecting 22:15,16,18,1 9 send 51:11,25 senior 38:5 sense 66:23 sent 53:25 60:11 63:1 sentence 59:9,14 September 1:19 5:2 series 8:4 service 4:5 21:16 30:25 31:4 33:18,20 48:18 services 21:9 34:5 session 32:1 set 13:5 20:1 70:6 settled 27:9 28:7 seven 33:9 41:17	several 7:20 shaking 8:19 she 18:23,25 21:19,20,22 37:2 39:9,12,13 43:16,17,20,2 1,22,24,25 44:16,18,21 62:22 63:25 67:8 68:1,11,14 Sheila 21:22 30:17 she's 22:1 31:5 49:20 63:25 67:24 shifting 37:18 shorthand 70:10 shortly 19:10 should 11:7 16:16 30:8 34:10,15,22,2 5 35:4,7 38:6 43:10 47:14 50:3 shoulder 29:15 show 25:18 47:20 52:5 61:8 showed 37:15 signature 51:13 signed 13:7 signing 13:4 Simcakoski 8:6	45:3 similar 12:2 similarly 1:7 since 18:23 34:20 43:8 67:21 sincerely 59:17 sit 31:25 44:24 situated 1:7 situation 36:21,24 six 9:5 29:19 30:6,7 41:16 sleeping 33:17 47:7 48:23 SMITH-WILLIAMS 1:5 some 7:16 8:7,10 9:16 10:24 14:14 15:18 19:13,16 20:3,5 21:10 25:21 26:11 27:8 28:9,14 29:14 32:7 34:5 38:4 39:21 42:22 43:22 44:1,8 55:24 56:5 60:12,18,19 61:2,10 somebody 24:4,19 55:13 58:2,3 someone 27:9
--	---	--	---



29:14 44:10 50:8 someone's 55:21 63:17 something 11:5 28:14 38:19 42:11 44:10 47:14 52:9 60:20,22 61:12 62:13,14 65:1,16,23 66:21 sometimes 16:18,20 23:23 somewhat 65:23 sooner 40:6,18 44:19 66:1 sorry 10:16 11:20,22 40:8,10 67:1 sorts 53:6 sound 9:1 16:11 36:11 53:12 sounded 65:14 sounds 9:3 17:11 21:2 29:1 source 61:10 62:5 speak 56:5 speaking 66:19 specific 20:16 specifically 65:19	speculate 8:20 speculation 31:13 56:2 60:8 spend 7:12 spent 21:5 spoke 15:8 spouses 60:6 stable 29:22 Stacy 49:19 staff 12:11 13:5 15:11,17 19:1 21:14,20 22:11 23:8,13 25:1 29:24 30:15,17,18 31:20 34:1,4 35:2 36:2,5 38:11 40:21 42:15,16 43:1 stage 62:13,15 stand 29:9 58:23 68:15 standard 10:1 standards 37:25 43:12 47:8 50:21 stands 68:16 start 46:25 started 12:10 starts 41:16 state 1:17 5:9 22:2 stated 18:2,23 statement 14:10	statements 34:12 70:8 states 1:1,10 2:7,8 53:22 70:2 stating 29:1 54:8,9 stationed 12:1 status 53:18 stenographical ly 70:8 sterilization 57:10 still 19:14,15 21:24 31:5 43:14 46:4 stop 6:24 16:17 story 56:13 Street 1:18 2:4 strenuously 47:1 stress 9:9 strict 48:9,17 strictly 26:5 strike 7:5 39:14 68:3 striking 68:6 strong 44:10,15 45:10,21 structure 19:1 subject 46:24 54:3	submitted 11:9 suburb 12:3 sued 27:7 sufficient 48:14 suggest 34:6 35:13 SUHR 1:6 Suite 2:4,9 supervising 34:9 supervision 35:6,8 36:9 65:15,19 supervisor 44:18 supervisory 27:8 suppose 7:21 22:1 25:3 supposed 24:9 39:18 49:24 sure 16:22 19:6 26:11 28:12 30:6 43:1 46:21 48:13 51:19 52:7 55:24 60:21,25 67:4,14 surprise 46:7,12 surprised 46:16 surrounding 8:4
--	--	---	---



survey 37:14	33:7 45:8	6:16,18,20,22	37:1,2,4,8,11
survive 15:15	tell 12:5 16:3	,23,25	,12,23
16:2	44:6 63:14,17	7:1,5,20,21	38:5,6,9,10,1
suspended 46:8	64:5	8:1,4,6,10,13	6,22,25
47:10	telling 48:3	,18	39:2,14,17,19
Sussex 5:13	58:2,4	9:1,4,11,14,2	40:2,5,12,17
sworn 5:6	ten 6:6,8	5 10:4,9,16	41:6,8,21,23
symptom 48:24	12:7,20 57:15	11:1,4,5,9,20	42:3,11,14
	tenure 20:14	,24 12:2,9,25	43:11
	65:20	13:1,2,4,6	44:8,12,13,14
<hr/> T <hr/>	term 65:6	14:5,8,10,16	,16,20,21,22
table 63:6	terminated	15:9,10,12,16	45:1,12,19,22
take 6:7	69:11	16:1,2,3,4,5,	,25 46:3,7
8:17,24 9:1	terminating	8,19,20,23	47:5,14,16
13:16,24,25	1:19	18:2,6,10,18	48:10,13,20,2
18:17 24:3	terms 55:14	19:3,7,10,12,	3
26:15,20	tested 56:14	15,17,21,23,2	49:4,12,14,16
32:21 38:2,6	testified 5:6	4	,18,21,24,25
41:10,17,22	testimony 7:15	20:1,6,11,12,	50:2,8,20,22,
51:4,25 52:21	61:21 69:9	13,16,18,21	24,25 51:13
taken 1:16	70:7	21:6,17,21,22	52:7,9,13
5:25 70:6,10	testing	22:20,22	53:3,6,12,19,
takes 18:6	55:17,18,23	23:8,9,14,16,	21,25
Taking 59:7	60:17,19,23,2	18	54:3,4,5,8,10
talk 8:16 24:1	4 61:4,7,18	24:10,13,25	,11,12,14,15,
25:10 40:11	62:3,6,19	25:11,18,19,2	21
64:4,7	63:13,14	2	55:2,3,4,6,10
talked 15:25	than 13:4	26:1,5,7,10,1	,12,17,18,21,
talking 8:12	23:18 26:1,8	1,13	22 56:7,9,19
14:24 17:22	37:13 39:3	27:1,6,10,12,	57:7,9,18,25
20:10 42:17	51:25	15,17,20	58:5,6,13,15,
57:3	55:19,20	28:11,12,14,1	19,20
task 32:7	58:13,19	5	59:5,8,9,11,1
tasking 32:11	62:14 66:22	29:1,5,13,15,	4,17,25
team 53:3	Thank 64:14,16	21,22	60:12,16,20,2
58:25	69:8	30:16,18	1,25
technically	that	31:3,9,11,15,	61:1,4,8,11,1
		16,17,19,23	4,15,17,19
		32:1,5,11	62:1,2,15,21,
		33:2,21,22	23
		34:8,13	63:3,7,10,12,
		35:5,12,13,15	14,19
		36:15,18,22	64:2,5,8



65:1,7,11,20, 22,24 66:2,6,7,16,2 1 67:4,22,25 68:18,20,21 70:6,7,9,10,1 1,13 that's 8:22 12:25 14:16 16:4,19 24:9 28:13 29:23 31:18 37:4,9 41:9 42:5 47:22,23 48:1 58:14 59:4 60:19,23 63:16 66:10 69:7 their 20:2 29:15 58:12,17 60:6 62:7 them 6:12,17,19,24 7:16 16:21 20:4 26:10 29:16 45:25 53:2 55:14 59:2 61:6 62:3,8 66:17 themselves 28:16,19 then 12:9 23:21,24 25:17 26:3 27:12 29:17 30:17 33:23 34:13 38:4 40:23 50:4 54:22 64:20 there	6:10,13,18,23 7:16,17 8:3,12 9:15,17 10:13 12:10,16 13:12,14 14:11,14,17,1 8 15:14,18 17:5,12,23 18:20,25 19:23 20:8,13,16,18 23:6,8,13 28:4 29:15 30:20 32:4 33:15 34:22 35:7,12 36:9,12,17 38:7 39:19 42:24 45:1,23 47:5,18 50:13 55:2 57:9,21 58:7,13,14,18 59:1 60:17,18 61:14 64:1,24 65:22,23 66:8 thereafter 70:9 therein 70:6 there's 8:24 11:24 26:23 27:6,11 29:4 33:24 34:5 47:1,24 54:2 58:3,4 62:15 67:3 THEREUPON 5:3 these 11:8 25:21 33:18 34:4,12,13 36:15	37:19,24,25 40:20 43:12 48:4 61:25 64:6 they 7:5,6 9:8,11,12 11:9 13:5,11 18:24 20:1 23:17,20,21,2 2 24:1,2 25:2,6,7,10,2 1,23 26:3,4,5,11 28:21 36:18 37:1 38:6,17 39:19 42:3,11,13,15 ,18 43:2,4 49:10 50:12 53:4,6,8 55:5,8,18,22, 23 58:12 60:9,17 61:9,12 62:4 63:14 64:6 they'd 59:23 they'll 23:15 they're 14:16 28:3 29:13,17,20 41:3 47:19 50:11 they've 19:1 64:11 thing 20:20 21:3 23:16 61:6 things 8:13 11:9 23:19,24 24:2,19 30:25	45:16 49:1,3 52:2 62:16 63:15 think 6:12,16 9:18,21,22 10:3,6,8 15:14 16:25 17:2 20:18 23:6,10 24:12,16 25:23 26:9 31:11 33:4,6 36:9,12,15,17 ,20,25 37:1,4,5,13,1 7 38:1,3,14,25 39:9,13 41:23 43:10,22 46:3 47:3 48:23 50:1 53:7 55:12,16 57:7 58:12,14 60:6 61:11,14 64:13,24,25 65:13,22 66:14,18 67:3 thinking 66:5 this 7:10,12 8:14 10:6,12,15 11:18,23 13:11 14:25 15:19 16:17 18:3 20:8 21:2 22:25 24:4 25:1 26:17,18,22,2 5 27:2,23 28:6,17,22 29:13 31:22 32:15,17
---	--	--	---



34:14,16,17,2 1,22,24,25 35:3,5 36:23 37:10 38:4,12,25 39:9 40:1 41:20 42:14,22,23,2 5 43:8,19,23 46:11,13,22 47:2 52:3,7,11,25 53:1,2,11 54:3 57:3,5,6,14,1 9 58:8,9,15,25 59:1,7,9,17 60:11 61:2,12,13,25 62:1,8,9,16 64:3 66:1,5,16 67:17,19 68:13,19 70:15 those 6:10 7:2 8:10 11:3 12:20 14:18 15:15 16:1 23:19,22 26:3 29:7,9,19 30:24 47:13 49:19 63:5,6,22,24 65:16 though 24:25 32:1 42:13 54:25 64:18 thought 15:15 16:2,23 43:25 44:18	three 18:17 32:21 52:21 threes 45:10 through 13:6,11 14:3 15:19 29:21,23 33:25 37:9,23 40:1 54:12 58:22,24 60:25 61:3 throughout 21:4 tie 47:2,3 time 7:12,23 8:11,22 10:24 11:3,9 16:24 18:6 19:24 21:5,22 30:23 34:23 37:21,22,23 41:17 43:5 54:23 63:15 66:6 70:6,8 times 6:3 28:2 tissue 56:10 title 28:9 TMJ 27:9 today 5:17 10:19 together 51:9 53:3,7 told 42:24 44:7,14 46:7 57:25 60:16 63:19 Tomah 1:18,19 4:3 5:22 6:11	7:22 9:5,18 11:16 12:23 13:1,8,20 15:18 18:24 19:3 31:5 43:14 45:15 46:4,19 47:13,14 48:8 ton 7:12 took 13:9 19:24 27:7 44:25 45:1 top 50:25 53:10 tort 7:6,10 23:18 25:16 26:6,8 28:2 town 19:1 toxic 14:9 20:15 65:23 toxicities 18:25 toxicity 14:12 track 31:1 tracking 63:6 tracks 23:18 trained 10:5 36:16 65:3 training 12:17 20:13,21,22 21:6 36:13,17 37:4,6 40:21 transcribed 70:9 transcript 4:11,12 69:2 70:9,10	transparent 55:10 61:5 traumatized 13:10,15 traumatizing 15:20 treated 59:11 60:12 62:4,14 treating 33:15 62:3 treatment 62:7 63:18 trend 45:12,22 tried 44:23 48:12 tries 4:3 13:19 true 9:14 34:12,13 35:5,7 47:19 59:11 70:10,13 trust 33:8 truth 61:6,25 try 6:12 16:9,16 55:10 trying 7:14 10:1 25:5 55:9 turn 18:16 32:21 52:21 56:25 59:13 turned 11:5,8 two 26:23 27:12 40:5,17 49:16 55:2 type 23:20
---	---	---	---



24:25 27:8 28:14 65:18 types 23:19 <hr/> U <hr/> U.S 2:6 unannounced 39:23 uncover 10:9 uncovered 41:24 under 1:16 53:8 70:7,13 understand 40:8 65:7 68:2,4,9 understanding 7:4 20:24 42:13 44:20 62:2 understood 67:4 Unfortunately 37:19 UNITED 1:1,10 2:7,8 70:2 universal 34:3 36:4 unknown 53:18 unlawful 46:8 unless 47:1 unrelated 26:11 until 8:15 29:15 34:16 35:20,21,23	45:20 up 8:8,10 22:24 25:18 26:12 28:15 34:15,17 37:23 39:5 43:2 44:4 45:7 52:9 53:10 58:12,16 61:3 upon 23:24 52:2 56:6 69:3 urine 45:17 us 24:10 45:13 51:9 use 42:10 46:8 47:10 48:24 65:6 used 57:9 58:5 using 43:8 usually 16:24 50:10 UWM-Milwaukee 11:14 <hr/> V <hr/> VA 1:18 4:3 5:22 6:11 9:5,18 11:16,17,18 12:10,15,23 13:1,8,20 20:24 23:3 31:5 38:4,13 40:2 43:10,14 44:1 46:4,19 47:13,14 48:8 53:3 61:9,18	65:24 vacancies 13:14 VAF 19:12 valid 23:23 valuing 20:25 various 12:10 VA's 38:1 61:8 versus 62:9 veteran 6:21 veterans 1:18 6:16 9:5,16 10:2 50:25 52:1 59:8 61:25 62:18 64:6 Vetpro 23:17 25:18,24,25 26:3,13 28:18 vibration 16:7,14 Victoria 1:15 3:2 4:3,4 5:1,4,11 13:19 41:6 69:11 video 10:13 vio 10:5 virus 55:15,23 57:9 60:1 61:9 viruses 9:12 56:7 visibly 37:11 VISN 11:19 12:1,3,7	25:13 33:1 39:18 44:7 51:17 53:15 voice 16:7,10,14 Voices 20:24 vs 1:9 <hr/> W <hr/> W26815 5:13 Wagner 44:18,19 wait 8:15 68:6 wake 14:5 walk 61:15 walked 37:9 want 6:24 16:9 17:7 18:10 23:7 24:19 25:9 28:5,6 41:6,10 47:12,19,20 48:1,6 67:5,8,12,17 69:5 wanted 50:12 64:4 wash 33:11 washing 34:3 36:4 Washington 2:9 wasn't 6:22 27:16 44:8,10 45:21 49:6,23 54:18 57:10,23 58:8 61:8
---	---	--	---



way 9:19 11:21,24,25 14:13 29:14 37:15 60:25 61:3 62:3,7 ways 20:2 we 6:17,18 7:11 8:16 10:15 11:9 13:14 15:25 17:19,22 19:11,14 20:20,22 24:3,25 26:17 29:16 30:9,15,22 34:20 36:23 37:8,11,13,15 40:5,11,17 41:10 45:12,13,14,1 9,20,24 47:15 48:2,9,11 49:8 51:10,11 52:4,8,9,12,1 7 53:2 54:9,10,23 55:9,10,17 56:19 57:24,25 58:19,20 60:19,20,21,2 5 61:1,2,4 62:23 63:8,10 wearing 33:14 we'd 8:13 weekly 22:7 weigh 54:22 we'll 68:14 went 15:14	37:15 44:16 54:12 55:3,4 58:22,24 59:8 were 6:13,15,17,18 ,23 7:1,2,5,12,16 8:3 9:11,12 12:5 13:11,12,14 14:5,11,14 15:14,17 17:19,22 18:3,8,25 19:11,14,23 20:1,3,18 23:22 26:13 32:4 33:15,18 34:4 35:17 36:5,15 37:2,13,25 38:11 39:22 41:22 45:1,19,23 51:11 52:8,10 55:2,3,5,8,9, 23 57:3,17,18,25 58:20 59:1,10,19 60:13,17,18 63:3,7,10,15 64:3,6,25 66:5 70:6,8 we're 13:17 16:8 17:22 24:17,18 37:18 64:13 67:16 Were 6:10 7:6 8:6 20:16 41:1 49:4,21	60:11 63:1 weren't 34:16 64:7 West 2:9 53:7 WESTERN 1:1 2:8 70:3 we've 37:7,12 41:12 69:7 what 5:23 6:15 7:12 9:8 10:21,25 11:11 13:8 14:13 15:9 17:1,18,20 18:2,3 19:7 22:3,13 23:16,20 24:1,25 25:2,4,11,15 26:17 28:21 29:9,16 31:22 33:4 34:10 35:10,14 36:18,22,25 37:13 39:4 40:12 44:22 45:13 48:20 49:7 51:11,20 52:5,25 53:21,24 55:9,16 57:6,23,24 58:4,23 61:6,25 62:5 63:3,5,14,18 65:18 66:4,13,15,18 67:1,8,18,20 68:4,11 whatever 31:17	48:17 what's 22:19 25:7 26:20 27:1 29:9 43:16 51:20 56:24 when 6:17 12:23 13:5,9 14:1 18:18 19:16,24 22:5 32:23 33:13,15 34:18 35:20 36:23 37:10 41:22 44:23 45:2 46:11 51:5,22 52:7,22 53:11 56:25 57:19,24 60:11 61:1 63:17 65:6,24 whenever 34:23 where 5:21 6:21 11:13,21,24 14:14 17:17,18 23:6 26:6,8 27:7 32:1 38:18 46:1,21 53:14 63:17 64:6 Whereupon 69:10 wherever 62:9 whether 15:18 31:18 35:3 46:17 48:7 55:13 61:12,13 62:4
--	--	---	--



63:7,8 69:4 which 6:10 10:5 12:18 20:24,25 23:17 34:15 45:10,15,16,1 7 49:12 67:18 70:6 while 10:15 39:20 44:1 who 9:23 15:8,12,15 21:13,17,21 22:20 23:12 28:11,12 30:13,16,17,2 4 43:25 44:6,18 47:6 49:18 50:5 51:15 54:14 55:3,4 58:10 60:20 62:21 63:19 64:7 whole 7:19 8:4 36:24 Who's 31:3 why 24:10 38:6 45:5 47:23 51:25 56:17 58:14 60:19,23 62:11 65:24 WI 2:9 will 16:20 22:21 24:23 25:18 29:8 32:21 52:15 William 2:3 4:6	Williams 49:19 Wisconsin 1:1,18,19 2:8 5:14 70:3,13 with 6:16,23 7:10,19 11:17 12:9,15 13:25 14:1,2,25 16:4 18:18 19:11,15 20:8,22 21:8 22:3 26:10 28:7,15 29:2,8 31:5,8 32:7,11,22,23 33:1 34:2 35:5,9 36:3,23 39:21 40:24 41:13,18 43:2 45:9,24 48:2,18 49:11 51:5,6,7,11,1 8 52:9,22 57:1 58:17 59:2 61:15 62:16,24 63:7 64:9,11 within 65:10 witness 1:16 3:2 5:5 16:16,22 17:25 19:10 31:14 42:3 60:9 64:16 67:3,11,14 68:6,12,18 69:6 70:7 witnesses 24:1 25:7,10 word 13:10	43:16 work 14:8,9 15:21 19:20 37:17 43:14 45:24 48:24 49:11 51:11 55:3,5 worked 18:24 33:1 51:9,15 62:23 working 16:3 33:13 44:1 64:11 works 17:10 world 65:10 would 8:9 13:6,10,15 15:18 18:4 21:20 22:5,15,16,17 ,18,22 25:3 26:7 27:24 28:1,5,17,18 29:2 30:6,13,20 31:16 33:7,8,22 34:13 35:1,5,8,22 38:10,25 39:2,4,7,10,1 2 41:8 42:3,15,16,20 45:10,15,17 46:7,11 48:10,12,13,1 7,18,20 49:18 50:14 55:21,22,24 56:6,11,14,16 ,17 60:7	61:2,24 62:1,3,4,7,8, 13,21,25 63:5,6,18 64:7 68:10 wouldn't 28:5 31:16 45:18 62:6 write 48:15 51:12 writing 41:7 57:18 wrong 21:4 45:22 wrote 54:23 57:24 <hr/> <div style="text-align: center;">Y</div> <hr/> yeah 6:9 7:9 11:7,8,23 15:14 17:13,15,24 18:13 20:4 24:16,22 26:23 28:23 31:14 41:3 42:8 46:16,25 47:22 53:20 57:5 59:6 year 18:4 19:17 35:25 36:8 37:14 47:9 years 11:18 12:7,9,20 14:19 61:16 yes 5:18,20 6:2 7:17 8:3,10 9:7 11:17 14:11
--	---	---	---



15:22 17:25	24 22:9,13	23 61:1,17	68:6
18:7 19:22	23:2,5,23	62:11,13	yourself 13:25
20:5 21:7	24:22	63:9,12,17,19	18:18 32:22
23:1 27:18,22	25:8,15,16,17	64:8,14,16,24	41:18 51:5
29:3,6 30:2,4	27:10,17,19,2	,25	52:22
31:6,10	3,24	65:1,6,13,15,	You've 58:3
32:9,12 36:14	29:2,4,5,7,25	18,22,24	Yup 68:17
38:14,24 39:8	31:11,22	66:1,4,6,14,1	
40:3,14	32:7,21,25	8,21	
43:15,18,21	33:4,9,25	67:6,12,21,23	
44:3,5,21	34:8,16,17,20	,24 68:7,10	<hr/> Z <hr/>
45:4 46:11,15	35:5,8,16	69:1,4,8	zero 53:18
51:14	36:9,12,15,20	you'd 69:5	
53:13,23 55:8	,25	you'll 8:25	
56:15,16,22	37:4,9,13,16,	13:16	
59:6,12,20,22	22	26:15,20	
,24 60:5,9	38:1,3,19,20,	50:23 56:24	
65:2,12,17,21	25	your	
66:3 69:6	39:9,14,15,22	5:9,12,15,23,	
you	,25 40:2	25 7:4	
5:9,17,19,21,	41:1,6,10,17,	8:16,19 11:11	
25 6:4,18	22 43:10,22	12:6 14:10	
7:1,8,9,11	44:2,4,6,8,12	16:10,19 19:6	
8:6,11,15,16,	,22,23	22:3 32:10	
18,20,21,22,2	45:5,8,18,19	42:21 43:1	
5	46:1,3,7,14,2	44:20 47:19	
9:1,4,8,11,17	1,23	51:13 52:12	
,18,21,24	47:19,20,25	58:5 59:4,18	
10:6,18,21	48:1,23	62:2 66:24	
11:4,15	49:4,21,25	67:9,12,19,20	
12:5,12,23	50:5,18	69:2,4,8	
13:3,4,9,24	51:8,18,22	you're 7:25	
14:5,16,24	52:8,10,13,15	10:14 14:1	
15:14,21	53:10,11,19,2	15:9 17:1	
16:2,4,9,21,2	5 54:7,8,20	18:19	
5	55:12,21	25:17,19	
17:7,12,14,18	56:4,6,7,13,1	32:23 40:9	
,20	4,16,18	42:17 46:21	
18:3,8,10,16,	57:3,17	47:17 51:5	
17	58:2,3,4,5,22	52:23 57:1	
19:3,7,11,16,	59:9,11,14,18	58:16 65:3,9	
20,24 20:16	,19,23,25		
21:5,8,11,19,	60:4,6,11,16,		

